

DECLARATION OF MELINDA BIRD

I, Melinda Bird, declare and affirm and would so testify from firsthand knowledge if called as a witness:

1. I have been counsel on this case since its filing in 2008. At that time, I served as Senior Counsel for the ACLU of Southern California. In September 2009, I left the ACLU and began working for Disability Rights California (DRC), where I am currently Litigation Director. I continued as counsel in this case when I moved to DRC, and resumed intensive work on the case in February 2010. I have been the primary DRC attorney working on this case and supervising other DRC attorneys working on the case.

2. Disability Rights California is a private, nonprofit corporation established in 1978 as California's independent, federally mandated system to advocate for the legal, civil and service rights of people with disabilities throughout the state. DRC attorneys have litigated numerous class actions matters in federal court.

QUALIFICATIONS AND EXPERIENCE

3. I graduated from law school in 1978 and have been licensed to practice law in California since 1980. I have worked on many individual and systemic cases involving the Americans with Disabilities Act. I have represented low-income people and people with disabilities in public interest litigation for thirty-five years. I have extensive experience in federal court class action litigation against state and county defendants. Cases in which I have been lead counsel or co-counsel include:

- *Oster v. Lightbourne* (previously *V.L. v. Wagner*), 669 F.Supp.2d 1106 (N.D. Cal., 2009) and 2012 WL 691833 (3/2/12) (based on the ADA, district court repeatedly enjoined cuts in home care services that would have otherwise caused "incredible human suffering" to hundreds of thousands of seniors and people with disabilities).

- *Emily Q. v. Bonta*, 208 F. Supp. 2d 1078 (C.D. Cal. 2001, aff'd 203 Fed.Appx. 35, 9th Cir. October 2006)
- *Rodde v. Bontá*, 357 F.3d 988 (9th Cir. 2004) (affirming injunction based on the ADA to prevent county's attempt to close noted rehabilitation hospital).
- *Beno v. Shalala*, 30 F.3d 1057 (9th Cir. 1994) (affirming order blocking cuts in state welfare benefits, based on federal agency's failure to consider evidence in the record).
- *Hansen v. McMahon*, 193 Cal.App.3d 283 (1987) (finding that state must provide emergency shelter to children in homeless families, where alternative was family break-up; result was new state Homeless Assistance Program providing \$50 million in services annually).
- *Robbins v. Superior Court*, 38 Cal.3d 199 (1985) (under California Constitution, county indigents may not be required to live in a "poorhouse").

4. Among other honors, I was awarded the 2012 Loren Miller Award by the California State Bar Association in 2012. This award is considered a life-time achievement award and is given annually to a lawyer admitted to practice in California who has demonstrated long-term commitment to legal services and who has personally done significant work in extending legal services to the poor. I was also named a 2007 Attorney of the Year (“CLAY Award”) in the area of Public Policy by California Lawyer Magazine; named one of the “Top Women Litigators” in California in 2007 by the Daily Journal legal newspaper, and was named one of Southern California’s “Super Lawyers” in the area of Constitutional Law/Civil Rights for four consecutive years in 2005-2010.

TIME RECORDS AND COSTS

5. I maintain contemporaneous time records, recording my time in tenths of

1 an hour on a computerized data base. I reviewed my time records for this case and
2 exercised billing judgment to eliminate many time entries. In general, I am judicious
3 in my billing, taking care to avoid duplicating the efforts of other counsel or charging
4 for time which was not productive or necessary.

5 6. As Litigation Director, I have trained and supervised DRC attorneys to
6 ensure that they also maintain accurate, contemporaneous time records by recording
7 their time in tenths of an hour on a computerized data base. Throughout the progress
8 of this case, preparing for settlement and in preparing this declaration, I carefully
9 reviewed the time records for other DRC attorneys who worked on this case. I
10 exercised billing judgment to eliminate hours that were duplicative or non-productive.
11 In our billing totals, I did not include hours from legal staff who worked fewer than 50
12 hours on the case. In my exercise of billing judgment, I also eliminated all hours from
13 attorney Joanne Kim. Below is a summary of the work of the remaining attorneys
14 who had more than 50 hours of time recorded.

- 15 a. Kevin Bayley - Mr. Bayley conducted and defended depositions,
16 managed written discovery, communicated with and traveled to visit our
17 named plaintiffs and was primarily responsible for preparing one of our
18 experts, Dr. Terry Hill. His law school graduation year is 2001.
- 19 b. Rachel Scherer – Ms. Scherer interviewed and obtained statements from
20 class members, summarized discovery and deposition transcripts, and
21 assisted at depositions. Her law school graduation year is 2007.
- 22 c. Sepedeh Tofigh – Ms. Tofigh was a law clerk who conducted legal
23 research, and interviewed and obtained statement from class members.
- 24 d. Ella Hushagen – Ms. Hushagen was a law clerk who was also pursuing a
25 joint degree in public health at UCLA. She reviewed and summarized
26 medical records from class members and prepared summaries of these
27 records, including identification of falls and injuries.
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1 7. Detailed time records for all DRC staff from February 8, 2010 to July 31,
2 2014 are attached as Exhibit B. These time records represent 2719 hours. I
3 discounted an additional 421 hours as described above, leaving a total of 2298 hours.

4 8. Under the settlement, attorneys' fees for all Plaintiffs' counsel are capped
5 at \$2.2 million. The lodestar for the four law firms that worked on this case is far in
6 excess of this cap. Consequently, I did not update our billing records to 2015 because
7 our hours already exceed our share of this cap.

8 9. One of my responsibilities as Litigation Director is setting and updating
9 our attorney fee rates. I consult with public interest and private law firms, review
10 recent court orders as part of this process. DRC rates for 2013-2014 by year of
11 graduation are attached as Exhibit C. This table summarizes total hours, hourly rates
12 and total billing for DRC attorneys and law clerks who billed over 50 hours to this
13 matter.
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Name	Law School Graduation	Hourly Rate	Attorney hours from 2/8/2010 to 7/31/2014	Lodestar as of 7/31/2014
Melinda Bird	1978	\$820	549.4	\$450,344
Kevin Bayley	2001	\$545	1320.3	\$719,400
Rachel Scherer	2007	\$455	206.7	\$94,048
Sepedeh Tofigh	Law clerk	\$230	60.8	\$13,984
Ella Hushagen	Law clerk	\$230	161.4	\$37,122
Total			2298.6	\$1,314,898

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22 10. I also identified costs and expenses related to this matter, which total
23 \$22,069. These expenses include deposition transcript costs, photocopying, and

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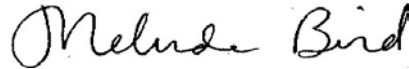
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1 travel. A detailed record of these expenses is attached as Exhibit D to this declaration.

2 I declare under penalty of perjury under the Laws of California that the
3 foregoing is true and correct to the best of my knowledge and belief. Executed this
4 2nd day of March, 2014, in Los Angeles, California.

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6
7 Melinda Bird

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9 Exhibit A – Bird Resume

10 Exhibit B – DRC hourly time records

11 Exhibit C – DRC attorney fee rates, 2013-14

12 Exhibit D – Expenses and costs
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EXHIBIT A

RESUME

MELINDA R. BIRD

Office: 350 S. Bixel Street, Suite 290
Los Angeles CA 90017
(213) 213-8105

LEGAL EXPERIENCE

June 2013 to present CO-LITIGATION DIRECTOR, DISABILITY RIGHTS CALIFORNIA

September 2009 to May 2013 SENIOR COUNSEL, DISABILITY RIGHTS CALIFORNIA
Complex civil rights and class action litigation involving disability rights, foster care, health and mental health benefits, prisons and jails.

August 2006 to August 2009 SENIOR COUNSEL, ACLU OF SOUTHERN CALIFORNIA
Complex civil rights and class action litigation involving disability rights, homelessness, First Amendment, foster care, mental health rights, prisons and jails.

July 1995
August 2006 MANAGING ATTORNEY, PROTECTION & ADVOCACY, INC., LOS ANGELES OFFICE
Complex civil rights and class action litigation and advocacy; manage a large public interest law office with a staff of 27 serving five Southern California counties.

May 1981 to June 1995 ATTORNEY, WESTERN CENTER ON LAW & POVERTY, INC.
State and federal class action and appellate litigation concerning health and public assistance benefits for low-income persons;

co-coordinator for state-wide legal aid task force on health and public benefits issues; training and manuals.

Sept. 1979 to
April 1981

STAFF ATTORNEY, LEGAL AID BUREAU,
MARYLAND, INC.

Sept. 1978 to
Sept 1979

STAFF ATTORNEY, WEST VIRGINIA LEGAL
SERVICES PLAN, INC.

1982

Admitted to California Bar

1978

Admitted to Maryland Bar

EDUCATION

1976 – 1978

RUTGERS UNIVERSITY SCHOOL OF LAW -
Newark. Juris Doctor Degree, June 1978.

1975 - 1976

ANTIOCH SCHOOL OF LAW, Washington,
D.C.

1966 - 1970

MASSACHUSETTS INSTITUTE OF
TECHNOLOGY, Cambridge, Massachusetts.
Bachelor of Science, 1970.

HONORS, ACTIVITIES

2012

Loren Miller Award for lifetime achievement in public
interest law from the California State Bar

2007

California Lawyer Attorney of the Year in the area of
Public Policy from California Lawyer Magazine

2007

Named one of the “Top Women Litigators” in
California by the Daily Journal legal newspaper.

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|-------------|--|
| 2006-2009 | Appointment by California State Bar to a three year term on the Standing Committee for the Delivery of Legal Services |
| 2005-2009 | Named one of South California "Super Lawyers" in the area of Constitutional Law/Civil Rights for four consecutive years |
| 2000-2001 | Member, Board of Directors, Family Voices |
| 1994 – 1999 | Member, Advisory Board, Impact Fund, Berkeley, California |
| 1994 - 1997 | Citizen's Budget Commission - appointee to state-wide commission funded by Ford Foundation to develop recommendations regarding reform of state legislative budget process |
| 1991 | Honoree, National Lawyers Guild, Los Angeles Chapter Annual Dinner |
| 1988 | Honoree, William O. Douglas Award Dinner, Public Counsel/Los Angeles County and Beverly Hills Bar Associations |
| 1983 - 1985 | Board of Directors, National Economic Development and Law Center |

PUBLICATIONS

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| 2005 | Author, <i>Emily Q.'s Story: Using Medicaid Litigation to Expand Positive Behavior Interventions for Children in the Mental Health System</i> , 5 Whittier Journal of Child and Family Advocacy 87, Fall 2005. |
| 2002 | Author of PAI publication, <i>A Guide to Children's Mental Health Services Under Medi-Cal</i> , October 2002, http://www.pai-ca.org/pubs/518801.pdf . |

- 2000 Author of PAI publication, *Managing Mental Health Care: A Report on California's Medi-Cal Mental Health System, 1997-1999*, <http://www.pai-ca.org/pubs/507101.htm>.
- 1999 Author of PAI publication, *Medi-Cal Mental Health Managed Care: Questions and Answers*, <http://www.pai-ca.org/pubs/530701.pdf>; presenter/trainer at local client and legal advocate trainings focusing on the new manual.
- 1998 Author of PAI publication, *Discharge and Aftercare Planning Manual*; presenter/trainer at trainings for clients and legal advocates regarding the new manual.
- 1996 Author of publication for PAI and the Catholic Charities, *How Immigrants with Disabilities Can Become Citizens*.
- 1994 Author of Western Center publication, *Getting It and Keeping It: the Impact of Monetary Awards on Clients Who Also Receive Government Benefits* (3d Edition)

MAJOR LITIGATION

Reported Cases (Lead or co-lead counsel)

V.L. v. Wagner, 669 F.Supp.2d 1106 (N.D.Cal., 2009) (district court granted preliminary injunction barring cuts to home care services for 130,000 Medicaid recipients, based on the Americans with Disabilities Act and Medicaid Act; appeal is pending).

Rodde v. Bontá, 357 F.3d 988 (9th Cir. 2004) (court of appeal sustained preliminary injunction preventing Los Angeles County from closing renown rehabilitation hospital, finding irreparable injury and likelihood of success on claims under the Americans with Disabilities Act).

Emily Q. v. Bontá, 208 F.Supp.2d 1078 (C.D.Cal. 2001), *aff'd*, 203 Fed.Appx. 35 (9th Cir. unpublished disposition, October 2006) (intensive, home and community based mental health services must be provided to certified state-wide class of Medicaid-eligible children

who would otherwise be institutionalized in the mental hospitals or residential facilities).

Hale v. Belshé, 117 F.3d 1425 (Table), 1997 WL 377113 (9th Cir. unpublished disposition) (Eleventh Amendment did not bar claims under the Americans with Disabilities Act in a federal court action against the state health services agency seeking community based mental health services for residents of psychiatric nursing homes).

California Homeless and Housing Coalition v. Anderson, 31 Cal.App.4th 450 (1994) (while requirements of federal law may be enforced through mandamus, state complied with federal requirements).

Beno v. Shalala, 30 F.3d 1057 (9th Cir. 1994) (federal agency's approval of waiver permitting reduction in state AFDC benefits is vacated for failing to consider evidence in the record).

Hamilton v. Madigan, 961 F.2d 838 (9th Cir. 1992) (federal law prevents USDA from reducing food stamp benefits for families receiving California Homeless Assistance benefits).

Guidotti v. County of Yolo, 214 Cal.App.3d 1552 (1989) (shelter allowance in general assistance grants must be based on actual availability of housing).

Board of Supervisors v. Superior Court (Comer), 207 Cal.App.3d 552 (1989) (county's duty under general relief statute to aid the indigent mentally ill is limited by funding cap in Short-Doyle Act).

Hansen v. McMahon, 193 Cal.App.3d 283 (1987) (state has a duty to provide emergency shelter to children in homeless families).

Boehm v. Superior Court, 178 Cal.App.3d 499 (1986) (county indigents have right to minimum benefits sufficient to provide clothing, food, shelter and transportation and medical care).

Robbins v. Superior Court, 38 Cal.3d 199 (1985) (county indigents may not be required to live in a "poorhouse").

Boehm v. County of Merced, 163 Cal.App.3d 447 (1985) (county may not reduce indigent benefits without first conducting a study of minimum subsistence needs).

Livermore v. Secretary of HHS, 743 F.2d 1396 (9th Cir. 1984) (SSI benefits must be increased for blind recipients and for recipients with working spouses).

Other Reported Cases

Pollard v. Ericsson, Inc., 125 Cal.App.4th 214 (2004) (amicus brief).

U.S. v. Kincade, 379 F.3d 813 (9th Cir. 2004) (amicus brief).

Fry v. Saenz, 98 Cal.App.4th 256 (2002) (amicus brief).

Galanty v. Paul Revere Life Ins. Co., 23 Cal.4th 368 (2000) (amicus brief).

Hunt v. Superior Court, 21 Cal.4th 984 (1999) (county's obligation to indigent resident includes duty to provide adequate health care).

Crespin v. Kizer, 27 Cal.App.4th 700 (1994) (state may require alien applicants for restricted Medi-Cal to disclose undocumented status).

Thornton v. Carlson, 4 Cal.App.4th 1249 (1992) (SSI special circumstances benefit may be used for unmet shelter needs).

Cooke v. Superior Court, 213 Cal.App.3d 401 (1989) (county's denial of dental care to indigent county patients was inhumane and illegal).

Nelson v. Board of Supervisors, 190 Cal.App.3d 25 (1987) (County may not deny GA to homeless who lack fixed address).

Cowan v. Myers, 187 Cal.App.3d 968 (1986) (amicus) (Medi-Cal medical necessity standard must be consistent with federal law.)

C.E.S. v. Deukmejian, 171 Cal.App.3d 954 (1985) (Upholding attorney's fees for plaintiffs who won an interim Supreme Court order prohibiting delay in AFDC benefits during budget impasse).

Jennings v. Jones, 165 Cal.App.3d 1083 (1985) (amicus) (General assistance recipients could be sanctioned only for willful violations).

Blanco v. McMahon, 198 Cal.App.3d 473, 736 (1988) (Access to medical benefits for immigrants).

Darces v. Woods, 35 Cal.3d 871 (1984) (State may not reduce AFDC benefits because of presence in family of undocumented children).

U.S. v. Wayte, 710 F.2d 1385 (9th Cir. 1983) (Legal rights of draft resisters).

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EXHIBIT B

Johnson Attorney Hours
2/8/2010 - 1/31/2013

Name	Law School Graduation Year	Hourly Rate	Attorney hours as of 1/31/2013	Lodestar as of 1/31/2013
Melinda Bird	1978	\$ 800.00	403.2	\$ 322,560.00
Monisha Coelho	2000	\$ 465.00	17.7	\$ 8,230.50
Kevin Bayley	2001	\$ 450.00	1320.3	\$ 594,135.00
Joanne Kim	2003	\$ 420.00	73.1	\$ 30,702.00
Andrew Berk	2005	\$ 390.00	19.2	\$ 7,488.00
Rachel Scherer	2007	\$ 360.00	206.7	\$ 74,412.00
Katherine Perez	Law clerk	\$ 175.00	13.1	\$ 2,292.50
Ella Hushagen	Law clerk	\$ 175.00	161.4	\$ 28,245.00
Sepedeh Tofigh	Law clerk	\$ 175.00	60.8	\$ 10,640.00
TOTAL				\$ 1,078,705.00

Attorney Hours 2/8/2010 - 1/31/2013

Date	Employee	Time	Action	Notes
3/23/2010	Andrew Berk	0.70	Call/Conference Call with/re:	Case conference about litigation.
3/5/2012	Andrew Berk	4.40	Other/Miscellaneous	Read draft of motion to dismiss (1.5); met with Kevin and Rachel about citation work for motion to dismiss (.3); worked on uncontroverted facts chart for summary judgment motion (3.4); checked in with Kevin about progress on uncontroverted facts chart (.2).
3/6/2012	Andrew Berk	0.40	Other/Miscellaneous	Called Kevin for new fact checking assignment (.2); started reading deposition summaries (.2).
3/7/2012	Andrew Berk	4.40	Other/Miscellaneous	Worked on uncontroverted facts sheet (4.1); spoke with Kevin about uncontroverted facts sheet (.1); IM'ed with Kevin about citation format for depositions (.2).
3/8/2012	Andrew Berk	0.10	Other/Miscellaneous	Spoke with Kevin about uncontroverted facts sheet (.1).
3/9/2012	Andrew Berk	0.30	Other/Miscellaneous	met with Kevin and Rachel about reviewing medical documents for mental health issues (.3).
3/13/2012	Andrew Berk	4.60	Other/Miscellaneous	reviewed prisoner records for mental health medications (4.6).
3/14/2012	Andrew Berk	4.30	Other/Miscellaneous	Reviewed prisoner records for mental health medications (4.3).
	Andrew Berk Total	19.20		
3/30/2011	Ella Hushagen	0.60	Meeting with/re:	Discussed upcoming motion for summary judgment with Melinda and Kevin. Received assignment to take inventory of falls from plaintiff declarations; and look at professional protocol for fall identification, reduction and prevention.
3/30/2011	Ella Hushagen	0.70	Review Documents/Records	Read Johnson complaint
3/30/2011	Ella Hushagen	1.30	Review Documents/Records	Read declarations and began making excel spreadsheet recording falls.
3/30/2011	Ella Hushagen	1.00	Review Documents/Records	Continued reading declarations and recording falls
4/4/2011	Ella Hushagen	1.00	Review Documents/Records	Continued reading client declarations and recording falls.
4/4/2011	Ella Hushagen	1.30	Review Documents/Records	Read declarations, recorded falls.

Attorney Hours 2/8/2010 - 1/31/2013

4/6/2011	Ella Hushagen	2.80	Review Documents/Records	Read declarations, record records of falls
4/6/2011	Ella Hushagen	3.00	Review Documents/Records	Read declarations; recorded falls.
4/6/2011	Ella Hushagen	0.30	Review Documents/Records	Completed Johnson spreadsheets, printed, emailed to Melinda & Kevin
4/11/2011	Ella Hushagen	0.20	Meeting with/re:	Asked Laura about medical records for Johnson plaintiffs; instructed about where to find her charts and records.
4/11/2011	Ella Hushagen	1.30	Review Documents/Records	Compared falls described in declarations to Laura's fact tables that catalog record
4/11/2011	Ella Hushagen	0.80	Review Documents/Records	Began searching plaintiff records directly for corroboration of reported falls; working on Andre Butler (for next time, start on file 2907-3307, page 145).
4/13/2011	Ella Hushagen	2.70	Review Documents/Records	Review records; compare recorded falls to falls identified by declarations
4/13/2011	Ella Hushagen	0.90	Fact Investigation	Research fall prevention on PubMed.
4/13/2011	Ella Hushagen	0.30	Meeting with/re:	Meeting with Melinda to discuss lit review regarding fall prevention
4/13/2011	Ella Hushagen	0.50	Review Documents/Records	Continued reviewing record (wrapped up Butler)
4/18/2011	Ella Hushagen	2.50	Legal Research	Research fall prevention requirements for hospitals/SNFs.
4/20/2011	Ella Hushagen	1.80	Legal Research	Research falls prevention protocol
4/20/2011	Ella Hushagen	2.50	Legal Research	Research falls prevention protocol; read Hill materials.
4/20/2011	Ella Hushagen	2.00	Review Documents/Records	Reviewed Curfman record; compared to dec.; prepared memo re: same
4/25/2011	Ella Hushagen	0.50	Review Documents/Records	Review Dr. Hill materials.
4/25/2011	Ella Hushagen	1.80	Review Documents/Records	Review Grigsby records, summarize
4/27/2011	Ella Hushagen	2.60	Legal Research	Researched irreparable injury for preliminary injunction
4/27/2011	Ella Hushagen	2.70	Review Documents/Records	Review Grigsby records, summarize
4/27/2011	Ella Hushagen	1.30	Review Documents/Records	Review Grigsby records, summarize

Attorney Hours 2/8/2010 - 1/31/2013

5/2/2011	Ella Hushagen	2.50	Review Documents/Records	Finished reviewing and summarizing Grigsby records.
5/4/2011	Ella Hushagen	2.00	Draft/Edit	Checked citations on Johnson TRO
5/4/2011	Ella Hushagen	2.10	Legal Research	Research fall prevention
5/4/2011	Ella Hushagen	2.50	Legal Research	Research fall prevention guidance
5/9/2011	Ella Hushagen	2.50	Legal Research	Started drafting memo re: falls prevention
5/11/2011	Ella Hushagen	2.30	Legal Research	Worked on memo re: falls
5/11/2011	Ella Hushagen	3.10	Legal Research	worked on memo
5/16/2011	Ella Hushagen	0.20	Meeting with/re:	Met with Kevin to discuss document review project
5/16/2011	Ella Hushagen	1.00	Review Documents/Records	Review Joe Gonzalez records, summarize
5/18/2011	Ella Hushagen	2.10	Review Documents/Records	Record review: Gonzalez, summarize
5/18/2011	Ella Hushagen	2.80	Review Documents/Records	Review Derrick White files, summarize
5/18/2011	Ella Hushagen	1.70	Review Documents/Records	Completed Gonzalez doc review, summarize
5/23/2011	Ella Hushagen	2.00	Review Documents/Records	Completed review of Derrick White documents, summarize
5/25/2011	Ella Hushagen	0.50	Meeting with/re:	Conf with Kevin & Melinda re: case strategy, 0.2. Research severity/variability of mobility disabilities (need for more than one device), and getting declarations from PT/OTs, 0.3
5/25/2011	Ella Hushagen	4.00	Review Documents/Records	Completed Ortiz document review, summarize. Emailed with Kevin about chart.
5/25/2011	Ella Hushagen	1.50	Review Documents/Records	Reviewed Johnson's records and summarized.
6/9/2011	Ella Hushagen	0.80	Review Documents/Records	Andre Butler document review, summarize
6/9/2011	Ella Hushagen	3.70	Review Documents/Records	Butler document review, summarize
6/10/2011	Ella Hushagen	2.00	Other/Miscellaneous	Researched mobility devices among CVA patients.
6/10/2011	Ella Hushagen	4.50	Review Documents/Records	Andre Butler document review; completed & emailed it to Kevin.

Attorney Hours 2/8/2010 - 1/31/2013

6/22/2011	Ella Hushagen	1.50	Prepare for Deposition	Reviewed prior records to find specific instances involving jail doctors who will be deposed soon
6/23/2011	Ella Hushagen	2.60	Prepare for Deposition	HIPAA research regarding privacy protections in deposition
6/23/2011	Ella Hushagen	0.20	Prepare for Deposition	Conf w/ Kevin Bayley re: depositions, HIPAA
6/23/2011	Ella Hushagen	3.80	Prepare for Deposition	HIPAA research
6/24/2011	Ella Hushagen	0.20	Meeting with/re:	Discussed with Kevin
6/24/2011	Ella Hushagen	2.30	Prepare for Deposition	Short memo for Kevin re: HIPAA
6/29/2011	Ella Hushagen	3.90	Deposition	Attend deposition, take notes, summarize
6/29/2011	Ella Hushagen	2.60	Deposition	Attend deposition of Dr Teophilov, take notes, summarize
6/30/2011	Ella Hushagen	0.10	Meeting with/re:	Conf w/ Kevin about summarizing Kwon's deposition
7/1/2011	Ella Hushagen	4.00	Legal Research	Continue to research ADA claims regarding accommodation plans
7/1/2011	Ella Hushagen	0.50	Other/Miscellaneous	Started summary of Kwan depo
7/5/2011	Ella Hushagen	2.80	Legal Research	Research Johnson questions re: injunctive relief and requirement of comprehensive policy
7/5/2011	Ella Hushagen	2.40	Legal Research	Research Johnson questions re: injunctive relief and requirement of comprehensive policy
7/5/2011	Ella Hushagen	0.40	Meeting with/re:	Conf w/ Kevin re: research on injunctive relief, need for comprehensive policy.
7/6/2011	Ella Hushagen	4.90	Legal Research	Research ADA claims re: requirements of planning.
7/6/2011	Ella Hushagen	1.70	Meeting with/re:	Met with Melinda, Kevin, and Rachel re: Johnson case strategy
7/7/2011	Ella Hushagen	6.60	Review Documents/Records	Worked on taking inventory of instances of discrimination from decs of named plaintiffs.
7/8/2011	Ella Hushagen	3.80	Legal Research	Research requirements for planning in ADA correctional cases
7/8/2011	Ella Hushagen	0.20	Meeting with/re:	Discuss dec and drafting depo questions with Kevin
7/8/2011	Ella Hushagen	2.60	Review Documents/Records	Instances of discrimination from decs of named plaintiffs
7/11/2011	Ella Hushagen	3.90	Legal Research	Researched ADA planning requirements; sent Armstrong to Kevin; read some Armstrong orders
7/11/2011	Ella Hushagen	2.70	Prepare for Deposition	Potential depo questions based on decs of named plaintiffs
7/12/2011	Ella Hushagen	3.10	Legal Research	Legal research on ADA requirements for compliance plan
7/13/2011	Ella Hushagen	1.70	Legal Research	Research into ADA planning requirements
7/13/2011	Ella Hushagen	1.70	Legal Research	ADA compliance legal research
7/14/2011	Ella Hushagen	2.50	Legal Research	Research on correctional setting compliance with ADA
7/14/2011	Ella Hushagen	0.60	Legal Research	Read through all Estelle v. Gamble cases

Attorney Hours 2/8/2010 - 1/31/2013

7/27/2011	Ella Hushagen	4.00	Legal Research	Researched unsuccessful Olmstead claims to compare to successful ones
7/27/2011	Ella Hushagen	0.30	Other/Miscellaneous	Johnson update from Kevin
7/27/2011	Ella Hushagen	0.80	Other/Miscellaneous	Started research on Olmstead claims overview
7/28/2011	Ella Hushagen	2.60	Legal Research	Reviewing TASC dockets for other cases related to integration mandate enforcement against state defendants on behalf of private nursing facility residents
7/29/2011	Ella Hushagen	0.50	Legal Research	Worked on finding other cases in TASC database
7/29/2011	Ella Hushagen	0.40	Meeting with/re:	Meeting with Melinda and Kevin re: action steps for Johnson MSJ
7/29/2011	Ella Hushagen	4.30	Review Documents/Records	Pulled declaration quotes regarding complaint process from decs
8/1/2011	Ella Hushagen	4.00	Legal Research	Cite-checking and updating mootness section of motion for summary judgment
8/10/2011	Ella Hushagen	1.00	Deposition	Took notes, helped with questions on Burns depo.
	Ella Hushagen Total	161.40		
12/6/2011	Joanne Kim	3.00	Other/Miscellaneous	Review deposition of Dr. Teophilov and summarize the transcript.
12/6/2011	Joanne Kim	3.30	Review Pleading/Brief	Review pleadings and exhibits. Review draft of summary judgment motion. Discussion with Autumn re next steps. Email to Kevin re comments re summary judgment motion draft.
12/7/2011	Joanne Kim	6.50	Other/Miscellaneous	Review deposition for Dr. Teophilov and create deposition summary. Review deposition for Terry main and create deposition summary.
12/12/2011	Joanne Kim	6.80	Other/Miscellaneous	Review and summarize depo transcript for Dr. Teophilov.
12/13/2011	Joanne Kim	7.00	Other/Miscellaneous	Deposition summary of Dr. Teophilov. Deposition summary of Chief Burns.
12/14/2011	Joanne Kim	6.50	Other/Miscellaneous	Completed depo summary of Chief Burns. Working on depo summary for Cruz.
12/19/2011	Joanne Kim	5.00	Other/Miscellaneous	Review draft of Summary Judgment Motion. Complete deposition summary of Cruz. Begin deposition summary for Smith.
12/20/2011	Joanne Kim	6.50	Other/Miscellaneous	Continue deposition summary of Smith.
12/21/2011	Joanne Kim	6.50	Other/Miscellaneous	Complete depo summary of Smith. Discussion with Kevin about next steps. Enter citations to uncontroverted facts from depo summary. Review Baker's deposition.

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12/27/2011	Joanne Kim	6.00	Other/Miscellaneous	Review Statement of Uncontroverted Facts and SJ Motion draft; compare for necessary changes; Find citations for facts in the SJ Motion draft.
12/28/2011	Joanne Kim	6.50	Other/Miscellaneous	Review of documents to find citations for facts in Summary Judgment motion draft
1/3/2012	Joanne Kim	6.50	Other/Miscellaneous	Gathering fact citations for the Summary Judgment motion draft
1/4/2012	Joanne Kim	3.00	Other/Miscellaneous	Work on finding fact citations for summary judgment motion draft
	Joanne Kim Total	73.10		
6/15/2012	Katherine Perez	7.10	Draft/Edit Pleading/Brief	Editing the supporting evidence and statements of uncontroverted facts for the SJ motion; Editing the formatting and grouping of the working list of statement of uncontroverted facts.
6/18/2012	Katherine Perez	6.00	Draft/Edit Correspondence/Memo	Editing the supporting evidence and statements of uncontroverted facts for the SJ motion; Editing the formatting and grouping of the working list of statement of uncontroverted facts.
	Katherine Perez Total	13.10		
6/16/2010	Kevin Bayley	0.30	Meeting with/re:	Discussion with Rachel Scherer re: visit to jail to meet with clients.
6/16/2010	Kevin Bayley	0.30	Other/Miscellaneous	Review of jail attorney room policies.
6/18/2010	Kevin Bayley	0.60	Meeting with/re:	Melinda Bird/Sepi Tofigh re: plans for case staffing, filings.
6/25/2010	Kevin Bayley	0.80	Call/Conference Call with/re:	Co-counsel re: upcoming scheduling conference.
6/28/2010	Kevin Bayley	0.10	Call/Conference Call with/re:	Call with Sepi re: co-counsel's appearance.
6/29/2010	Kevin Bayley	0.30	Other/Miscellaneous	E-mails re: presentation to Pasadena PD's office.
6/30/2010	Kevin Bayley	0.80	Review Pleading/Brief	Amicus brief in Georgia ADA case.
7/2/2010	Kevin Bayley	2.70	Meeting with/re:	Visit to clients Grigsby, Ortiz, Gonzalez at MCJ re: recent developments.
7/2/2010	Kevin Bayley	1.40	Prepare for Meeting	Prepare for meeting with clients. Review declarations, jail procedures.
7/2/2010	Kevin Bayley	0.80	Travel	To/From Jail for meeting with clients.
7/6/2010	Kevin Bayley	0.30	Other/Miscellaneous	E-mails to ST re: fact memo.
7/6/2010	Kevin Bayley	0.60	Review Correspondence/Memo	Reviewing fact memo by ST re: 7/2 visits with clients.

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7/6/2010	Kevin Bayley	1.80	Review Correspondence/Memo	reviewing earlier correspondence, pleadings in case.
7/8/2010	Kevin Bayley	0.40	Review Pleading/Brief	Review of prior pleadings in case.
7/12/2010	Kevin Bayley	0.50	Other/Miscellaneous	E-mails re: call re: next steps.
7/12/2010	Kevin Bayley	0.80	Review Pleading/Brief	Answer to amended complaint.
7/13/2010	Kevin Bayley	1.30	Call/Conference Call with/re:	Prep for and call with litigation team re: next steps in case.
7/13/2010	Kevin Bayley	0.20	Other/Miscellaneous	Finalizing letters to clients.
7/15/2010	Kevin Bayley	0.50	Meeting with/re:	Meeting with Melinda Bird re: prior expert visits/reports.
7/15/2010	Kevin Bayley	0.70	Other/Miscellaneous	E-mails, other correspondence re: issues at jail. Interplay with Rutherford case.
7/15/2010	Kevin Bayley	1.80	Review Documents/Records	Review expert reports, correspondence, other documents from prior visits.
7/16/2010	Kevin Bayley	0.40	Review	Review our files to determine if we had matching retainers.
7/16/2010	Kevin Bayley	0.20	Review Documents/Records	case retainers.
7/19/2010	Kevin Bayley	0.20	Draft/Edit Correspondence/Memo	E-mails from co-counsel re: urgent situation at jail.
7/19/2010	Kevin Bayley	0.10	Other/Miscellaneous	E-mail re: declarations.
7/23/2010	Kevin Bayley	0.30	Draft/Edit Correspondence/Memo	E-mails re: declaration-taking trips to jail.
7/27/2010	Kevin Bayley	0.10	Call/Conference Call with/re:	Attempt to call Shawna Parks re: experts.
7/27/2010	Kevin Bayley	1.20	Other/Miscellaneous	Review new accessibility guidelines recently issued.
7/28/2010	Kevin Bayley	0.20	Call/Conference Call with/re:	Matt Strugar from DRLC re: declaration-gathering.
7/28/2010	Kevin Bayley	0.30	Call/Conference Call with/re:	call with Shawna Parks re: expert reports.
7/29/2010	Kevin Bayley	0.10	Call/Conference Call with/re:	Voicemail to potential expert.
7/29/2010	Kevin Bayley	0.30	Other/Miscellaneous	E-mail to Melinda Bird re: call with Shawna, expert issues, focus of case.
7/29/2010	Kevin Bayley	0.30	Other/Miscellaneous	E-mails with Matt Strugar from DRLC re: retainers for named clients.

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7/30/2010	Kevin Bayley	0.30	Call/Conference Call with/re:	2 Calls with potential expert.
7/30/2010	Kevin Bayley	2.40	Draft/Edit Correspondence/Memo	Reviewing complaint, answer to generate proof chart.
8/2/2010	Kevin Bayley	0.30	Other/Miscellaneous	E-mails to/from with litigation team.
8/4/2010	Kevin Bayley	0.30	Meeting with/re:	CO-counsel re: numerosity of class.
8/4/2010	Kevin Bayley	0.60	Other/Miscellaneous	E-mails with co-counsel re: class declarations.
8/5/2010	Kevin Bayley	0.40	Call/Conference Call with/re:	Call with co-counsel re: planning for declarations.
8/6/2010	Kevin Bayley	0.30	Other/Miscellaneous	E-mails with co-counsel re: potential leads at jail.
8/9/2010	Kevin Bayley	0.10	Call/Conference Call with/re:	Dr. Greifinger re: expert retention.
8/9/2010	Kevin Bayley	0.20	Call/Conference Call with/re:	Will Robinson re: expert retention.
8/9/2010	Kevin Bayley	0.10	Call/Conference Call with/re:	James Sheldon re: help with expert retention.
8/9/2010	Kevin Bayley	0.10	Call/Conference Call with/re:	Voicemail to Will Robinson re: possible retention as expert.
8/9/2010	Kevin Bayley	0.10	Call/Conference Call with/re:	Voicemail from Will Robinson re: possible retention as expert.
8/9/2010	Kevin Bayley	0.20	Call/Conference Call with/re:	Call with Will Robinson re: possible retention as expert.
8/9/2010	Kevin Bayley	0.10	Meeting with/re:	Marilyn Holle re: Will Robinson's suitability as expert.
8/10/2010	Kevin Bayley	0.10	Call/Conference Call with/re:	Voicemail from NLS re: expert retention questions.
8/10/2010	Kevin Bayley	0.30	Review Correspondence/Memo	Review agenda for Logan Hopper's visit from Shawna.
8/17/2010	Kevin Bayley	0.40	Meeting with/re:	With Melinda re: case timeline.
8/23/2010	Kevin Bayley	0.40	Other/Miscellaneous	E-mails re: upcoming call.
8/24/2010	Kevin Bayley	0.60	Call/Conference Call with/re:	With co-counsel re: timeline of litigation.
8/25/2010	Kevin Bayley	0.30	Call/Conference Call with/re:	Call with Michael Bien re: potential experts.

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8/25/2010	Kevin Bayley	0.60	Draft/Edit Correspondence/Memo	Letter to Will Robinson re: potential work on case.
8/25/2010	Kevin Bayley	0.20	Other/Miscellaneous	E-mails from co-counsel re: scheduling issues.
8/27/2010	Kevin Bayley	0.10	Call/Conference Call with/re:	With Matthew Strugar re: class members current situation.
8/27/2010	Kevin Bayley	0.20	Other/Miscellaneous	E-mails with Matthew Strugar re: class members who need a visit.
8/30/2010	Kevin Bayley	0.40	Draft/Edit Correspondence/Memo	Finalizing letter to send to Will Robinson, giving instructions to support.
9/1/2010	Kevin Bayley	0.30	Call/Conference Call with/re:	Call with Sara Norman re: looking for expert.
9/1/2010	Kevin Bayley	0.20	Call/Conference Call with/re:	Call with Matthew Strugar re: current clients at jail.
9/1/2010	Kevin Bayley	0.20	Other/Miscellaneous	E-mails to/from Michael Bien re: looking for expert.
9/1/2010	Kevin Bayley	0.10	Other/Miscellaneous	E-mails with Sara Norman re: looking for expert.
9/1/2010	Kevin Bayley	0.30	Other/Miscellaneous	E-mails with &Matthew Strugar re: individuals needing a visit.
9/1/2010	Kevin Bayley	0.50	Other/Miscellaneous	Drafting e-mail to potential experts, reading, responding to replies.
9/1/2010	Kevin Bayley	0.20	Review Correspondence/Memo	From Justin Clark re: class cert, class counsel.
9/2/2010	Kevin Bayley	0.20	Other/Miscellaneous	E-mail from Dr. Greifinger re; expert search, e-mail to Melinda/Shawna re: same.
9/2/2010	Kevin Bayley	0.30	Other/Miscellaneous	E-mails with staff re: interpreter for visit to jail.
9/3/2010	Kevin Bayley	0.20	Other/Miscellaneous	E-mails with potential expert.
9/3/2010	Kevin Bayley	0.40	Review Documents/Records	Reviewing draft declarations.
9/7/2010	Kevin Bayley	0.20	Other/Miscellaneous	E-mails to/from potential expert.
9/7/2010	Kevin Bayley	0.90	Review Correspondence/Memo	Reading manual re: right to medical care.
9/7/2010	Kevin Bayley	0.40	Review Pleading/Brief	Reviewing draft declarations.
9/8/2010	Kevin Bayley	1.10	Review Pleading/Brief	Reading latest Armstrong ruling for background/applicability to our case.
9/10/2010	Kevin Bayley	1.00	Call/Conference Call with/re:	Call with co-counsel re: depos, other updates.
9/10/2010	Kevin Bayley	0.30	Other/Miscellaneous	Reviewing draft declarations.
9/10/2010	Kevin Bayley	0.40	Other/Miscellaneous	E-mails setting time for call, agenda for call, other tasks.

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9/13/2010	Kevin Bayley	0.90	Legal Research	Reviewing case law (Armstrong, Clark, other recent prison litigation)
9/13/2010	Kevin Bayley	0.20	Legal Research	Re: LA County Sheriffs department structure.
9/14/2010	Kevin Bayley	0.80	Call/Conference Call with/re:	Call with Dr. Greifinger; meeting with MB re: same.
9/14/2010	Kevin Bayley	0.20	Call/Conference Call with/re:	Calls to Will Robinson re: expert help. VM left.
9/15/2010	Kevin Bayley	0.90	Call/Conference Call with/re:	Call with Melinda Bird, Dr. Greifinger. Meeting with Melinda re: same.
9/15/2010	Kevin Bayley	0.30	Other/Miscellaneous	Call with Brief Williams, re: expert help.
9/15/2010	Kevin Bayley	0.50	Other/Miscellaneous	E-mails with Dr. Hill, Marc Stern re: expert help.
9/16/2010	Kevin Bayley	0.20	Other/Miscellaneous	E-mails with MB re: expert search progress, speaking with Dr. Hill.
9/16/2010	Kevin Bayley	0.20	Other/Miscellaneous	E-mails with Marc Stern re: potential expert help.
9/17/2010	Kevin Bayley	2.10	Call/Conference Call with/re:	Calls to potential experts.
9/17/2010	Kevin Bayley	0.70	Meeting with/re:	Meeting with MB re: what we will be asking experts to do, structure of what we're getting from them.
9/17/2010	Kevin Bayley	0.40	Other/Miscellaneous	E-mails re: units, numbers of individuals at CJ.
9/21/2010	Kevin Bayley	1.20	Call/Conference Call with/re:	Call with Dr. Hill, E-mails with MB re: same.
9/26/2010	Kevin Bayley	0.20	Review Documents/Records	Brief review of documents sent by Dr. Hill, forwarding to Melinda.
9/27/2010	Kevin Bayley	0.30	Review Correspondence/Memo	Review draft declaration.
9/27/2010	Kevin Bayley	2.10	Review Documents/Records	Review of documents provided by Dr. Hill.
9/28/2010	Kevin Bayley	0.50	Call/Conference Call with/re:	Call with co-counsel re: status of case.
9/28/2010	Kevin Bayley	0.20	Other/Miscellaneous	Review letter to Clark re: medical expert.
9/28/2010	Kevin Bayley	0.50	Review Correspondence/Memo	E-mails with Kim Swain about potentially using Dr. Hill as expert. E-mail to Debbie Dorfman about potentially using Marc Stern as expert.
9/29/2010	Kevin Bayley	0.20	Call/Conference Call with/re:	Call to Marc Stern re: potential use as expert.
9/29/2010	Kevin Bayley	0.20	Meeting with/re:	Discuss Clark letter with MB.

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9/29/2010	Kevin Bayley	0.50	Meeting with/re:	discussing expert options with Melinda/Kim.
10/4/2010	Kevin Bayley	1.80	Draft/Edit Correspondence/Memo	List of questions for our clients to aid in discovery.
10/4/2010	Kevin Bayley	0.40	Legal Research	Review federal rule of civil procedure 26 changes.
10/4/2010	Kevin Bayley	0.50	Meeting with/re:	Meeting with Melinda re: questions for our clients.
10/4/2010	Kevin Bayley	0.20	Other/Miscellaneous	E-mails re: expert visit.
10/5/2010	Kevin Bayley	0.60	Call/Conference Call with/re:	Calls with potential PT's, physiatrists.
10/5/2010	Kevin Bayley	0.50	Draft/Edit Correspondence/Memo	Editing questions for our clients.
10/5/2010	Kevin Bayley	0.40	Draft/Edit Correspondence/Memo	E-mails with Melinda, Kim re: scheduling call with Dr. Hill.
10/5/2010	Kevin Bayley	0.20	Draft/Edit Correspondence/Memo	E-mails with Dr. Hill re: call discussing retention for case.
10/5/2010	Kevin Bayley	0.50	Fact Investigation	Web research re: potential experts.
10/5/2010	Kevin Bayley	0.40	Meeting with/re:	Meeting with Melinda re: informal discovery.
10/5/2010	Kevin Bayley	0.70	Meeting with/re:	Meeting with Melinda re: tasks for Johnson.
10/6/2010	Kevin Bayley	0.50	Other/Miscellaneous	E-mails: with support staff re: calendaring events; with co-counsel re: dates for expert visit; with co-counsel re: setting conference call to discuss case developments.
10/6/2010	Kevin Bayley	2.80	Other/Miscellaneous	Travel to jail and meet with clients Joel Gonzalez and Carlos Ortiz re: jail staffing.
10/6/2010	Kevin Bayley	0.40	Other/Miscellaneous	E-mails with colleagues and expert setting call for 10/8.
10/7/2010	Kevin Bayley	0.50	Call/Conference Call with/re:	Call with co-counsel re: discovery issues, other developments in case.
10/7/2010	Kevin Bayley	0.50	Draft/Edit Correspondence/Memo	Draft agenda for call with Dr. Hill.
10/7/2010	Kevin Bayley	0.50	Other/Miscellaneous	E-mails with co-counsel re: issues with defendants discovery responses, expert visit scheduling.
10/8/2010	Kevin Bayley	2.00	Call/Conference Call with/re:	With MB, KS, Dr. Hill re: parameters of case.
10/8/2010	Kevin Bayley	0.40	Draft/Edit Interrogatories	Draft interrogatories.
10/8/2010	Kevin Bayley	0.50	Prepare	For call with potential expert Dr. Hill.

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10/11/2010	Kevin Bayley	0.50	Other/Miscellaneous	E-mails with colleagues re: class certification issues.
10/13/2010	Kevin Bayley	1.40	Draft/Edit Correspondence/Memo	draft letters of retention, confidentiality for Dr. Hill.
10/13/2010	Kevin Bayley	1.80	Other/Miscellaneous	Review of client files, e-mails with co-counsel re: class cert declarations, review of draft declarations.
10/13/2010	Kevin Bayley	0.50	Other/Miscellaneous	E-mails re: class cert meeting re-scheduling.
10/14/2010	Kevin Bayley	2.10	Other/Miscellaneous	E-mails with Melinda Bird, review of case planning chart, other documents in advance of 10/15 meeting with co-counsel.
10/15/2010	Kevin Bayley	3.80	Other/Miscellaneous	Meet with co-counsel at DRLC re: class cert issues, discovery issues, etc.
10/18/2010	Kevin Bayley	2.20	Other/Miscellaneous	Further research re: records request procedures and forms. Cover letters for other facilities/organizations.
10/19/2010	Kevin Bayley	0.60	Other/Miscellaneous	Discussions with co-counsel re: declarations for class cert motion,
10/19/2010	Kevin Bayley	1.00	Other/Miscellaneous	Call with co-counsel, expert Logan Hopper.
10/19/2010	Kevin Bayley	2.40	Review Discovery Responses	Review of documents obtained through discovery.
10/22/2010	Kevin Bayley	1.10	Draft/Edit Correspondence/Memo	Being drafting index of documents for expert.
10/22/2010	Kevin Bayley	1.50	Other/Miscellaneous	Review depo outlines, class cert draft, timeline for depositions.
10/22/2010	Kevin Bayley	2.20	Review Discovery Responses	Review of documents received in discovery.
10/25/2010	Kevin Bayley	3.40	Legal Research	Review of client medical records from discovery, meeting with Melinda/paralegal re: same. Meeting with Melinda re: next tasks to prep for expert visit.
10/26/2010	Kevin Bayley	0.30	Call/Conference Call with/re:	Standing call with co-counsel re: status of case.
10/27/2010	Kevin Bayley	0.50	Draft/Edit Correspondence/Memo	Chart for medical expert.
10/27/2010	Kevin Bayley	0.40	Other/Miscellaneous	E-mails with paralegal D. re: case binders.
10/27/2010	Kevin Bayley	5.40	Review Discovery Responses	Reading through discovery to draft chart for Medical expert.
10/28/2010	Kevin Bayley	1.60	Legal Research	Reading Coleman/Plata pleadings for background.
10/29/2010	Kevin Bayley	1.50	Call/Conference Call with/re:	Call with co-counsel re: class cert motion, verifications for responses to interrogatories, expert visits.

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10/29/2010	Kevin Bayley	0.30	Call/Conference Call with/re:	Dr. Hill re: available dates, other updates to case.
10/29/2010	Kevin Bayley	1.30	Legal Research	Reading Coleman/Plata pleadings for background.
11/1/2010	Kevin Bayley	0.40	Draft/Edit Correspondence/Memo	Records requests.
11/1/2010	Kevin Bayley	0.30	Draft/Edit Correspondence/Memo	Letter to expert re: retention terms.
11/1/2010	Kevin Bayley	1.10	Draft/Edit Pleading/Brief	Review/edit class cert motion drafts.
11/1/2010	Kevin Bayley	0.30	Meeting with/re:	Rosa/paralegal re: expert retention procedures.
11/1/2010	Kevin Bayley	0.20	Other/Miscellaneous	E-mails with co-counsel re: decs for class cert motion.
11/1/2010	Kevin Bayley	0.20	Other/Miscellaneous	E-mails with co-counsel re: scheduling of depositions.
11/1/2010	Kevin Bayley	0.30	Other/Miscellaneous	E-mails exchanges with co-counsel re: timing of Expert Terry Hill's visit.
11/2/2010	Kevin Bayley	0.40	Draft/Edit Pleading/Brief	Paragraph for class cert brief declaration.
11/2/2010	Kevin Bayley	0.30	Fact Investigation	Review of client records and e-mails with Matthew Strugar re: questions for Kuykendall depo.
11/2/2010	Kevin Bayley	0.30	Legal Research	E-mails with Matthew Strugar re: declarations from jail inmates.
11/2/2010	Kevin Bayley	0.50	Meeting with/re:	Meeting with Melinda re: next steps for medical expert visit, records requests.
11/2/2010	Kevin Bayley	0.30	Meeting with/re:	paralegal re: getting materials to expert, setting up other files.
11/2/2010	Kevin Bayley	0.30	Other/Miscellaneous	E-mails with co-counsel re: logistics for medical expert visit.
11/2/2010	Kevin Bayley	0.20	Other/Miscellaneous	E-mail to Dr. Hill re: upcoming visit.
11/3/2010	Kevin Bayley	0.10	Call/Conference Call with/re:	Shawna Parks re: visit of Dr. Hill to jail.
11/3/2010	Kevin Bayley	0.40	Draft/Edit Correspondence/Memo	Resume to include with class cert motion.
11/3/2010	Kevin Bayley	0.30	Draft/Edit Correspondence/Memo	Drafting records request for Columbus Grigsby.
11/3/2010	Kevin Bayley	1.60	Fact Investigation	Reading declarations from class members.
11/3/2010	Kevin Bayley	0.40	Fact Investigation	Documents to include in package for Dr. Hill.
11/3/2010	Kevin Bayley	0.20	Fact Investigation	Review of article re: geriatric prison population.
11/3/2010	Kevin Bayley	0.30	Other/Miscellaneous	Reviewing e-mails re: filing of class cert motion.

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11/3/2010	Kevin Bayley	0.10	Other/Miscellaneous	E-mail from Dr. Hill re: upcoming visit.
11/4/2010	Kevin Bayley	0.70	Other/Miscellaneous	E-mails with co-counsel re: timing, staffing of upcoming depositions (0.3), e-mails with expert re: upcoming visit (0.4).
11/5/2010	Kevin Bayley	0.10	Call/Conference Call with/re:	Voicemail to expert re: upcoming visit.
11/5/2010	Kevin Bayley	0.30	Draft/Edit Pleading/Brief	Draft of PMK depo notice.
11/5/2010	Kevin Bayley	0.80	Meeting with/re:	With Melinda re: upcoming expert visit.
11/5/2010	Kevin Bayley	0.30	Other/Miscellaneous	E-mails with Melinda re: expert prep.
11/5/2010	Kevin Bayley	1.10	Review Correspondence/Memo	Prepping for expert visit.
11/5/2010	Kevin Bayley	1.10	Review Documents/Records	Prior expert reports in case.
11/5/2010	Kevin Bayley	0.30	Review Documents/Records	E-mails with co-counsel re: upcoming expert visit.
11/5/2010	Kevin Bayley	0.80	Review Pleading/Brief	Sup. Ct. briefs in Armstrong case.
11/6/2010	Kevin Bayley	1.30	Draft/Edit Correspondence/Memo	Chart of allegations in first amended complaint.
11/6/2010	Kevin Bayley	0.80	Review Pleading/Brief	Reading first amended complaint to determine allegations.
11/7/2010	Kevin Bayley	0.30	Call/Conference Call with/re:	Call with expert re: postponement of visit to jail.
11/7/2010	Kevin Bayley	2.50	Draft/Edit Correspondence/Memo	Chart of allegations in first amended complaint.
11/7/2010	Kevin Bayley	0.50	Other/Miscellaneous	E-mails with co-counsel, expert re: postponement of expert visit.
11/8/2010	Kevin Bayley	1.50	Call/Conference Call with/re:	With Melinda/Dr. Hill re: upcoming expert visit to jail.
11/8/2010	Kevin Bayley	0.50	Draft/Edit Pleading/Brief	Review/edit class certification motion.
11/8/2010	Kevin Bayley	0.30	Meeting with/re:	With Melinda re: call with expert/upcoming expert visit.
11/8/2010	Kevin Bayley	0.30	Other/Miscellaneous	E-mails with co-counsel re: re-scheduling expert visit.
11/8/2010	Kevin Bayley	0.30	Other/Miscellaneous	E-mails with Shawna Parks re: opposing counsel responses re: upcoming expert visit.
11/8/2010	Kevin Bayley	1.10	Review Documents/Records	Documents produced by Dr. Hill during time with prison receiver.

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11/8/2010	Kevin Bayley	0.30	Review Documents/Records	E-mails with paralegal re: getting together materials by/for Dr. Hill.
11/8/2010	Kevin Bayley	0.30	Review Pleading/Brief	Review draft of PMK notice.
11/8/2010	Kevin Bayley	0.20	Review Pleading/Brief	Draft RFA's.
11/9/2010	Kevin Bayley	0.90	Call/Conference Call with/re:	Weekly call.
11/9/2010	Kevin Bayley	0.90	Draft/Edit Correspondence/Memo	Request for visit to Donald Peterson and supporting documents.
11/10/2010	Kevin Bayley	0.50	Draft/Edit Correspondence/Memo	Records request for Gonzalez.
11/10/2010	Kevin Bayley	1.10	Meeting with/re:	Waiting for/meeting with client Carlos Ortiz to have him sign declaration.
11/10/2010	Kevin Bayley	0.40	Other/Miscellaneous	E-mails with Ben G re: Ortiz declaration.
11/10/2010	Kevin Bayley	0.30	Other/Miscellaneous	E-mails with co-counsel re: class cert motion.
11/10/2010	Kevin Bayley	0.20	Prepare for Meeting	Prepare documents for meeting with client.
11/10/2010	Kevin Bayley	0.80	Travel	To/from meeting at jail with client Carlos Ortiz to have him sign declaration.
11/11/2010	Kevin Bayley	0.80	Draft/Edit Pleading/Brief	Editing Initial disclosures to include new declarants.
11/11/2010	Kevin Bayley	0.70	Draft/Edit Pleading/Brief	Review of drafts of compendium,
11/14/2010	Kevin Bayley	0.50	Other/Miscellaneous	E-mails with Melinda/Dr. Hill re: visit to jail on 11/15.
11/15/2010	Kevin Bayley	0.20	Call/Conference Call with/re:	With Matthew Strugar re: HIPPA forms, and visits to prison.
11/15/2010	Kevin Bayley	1.20	Meeting with/re:	Melinda re: expert visit.
11/15/2010	Kevin Bayley	0.90	Meeting with/re:	Expert and Melinda re: visit to jail.
11/15/2010	Kevin Bayley	0.40	Meeting with/re:	Meeting with expert at lunch re: morning thoughts.
11/15/2010	Kevin Bayley	2.40	Meeting with/re:	Meeting with Dr. Hill, Shawna, Melinda re: his thoughts on the jail.
11/15/2010	Kevin Bayley	0.40	Meeting with/re:	With Melinda re: Hill's impression of morning.
11/15/2010	Kevin Bayley	0.30	Prepare for Meeting	Review of what HIPPA forms we have.
11/15/2010	Kevin Bayley	1.50	Travel	To/from/to jail for meeting with expert.
11/16/2010	Kevin Bayley	0.40	Other/Miscellaneous	E-mails with co-counsel re: briefing schedule.
11/16/2010	Kevin Bayley	0.60	Other/Miscellaneous	E-mails with expert re: visit of 11/15.

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11/17/2010	Kevin Bayley	1.20	Other/Miscellaneous	Review of depo transcripts for Baker and Kuykendall for medical information.
11/17/2010	Kevin Bayley	2.10	Review Documents/Records	Review of materials by/about Dr. Hill.
11/19/2010	Kevin Bayley	0.20	Call/Conference Call with/re:	Call with Wasco staff re: visit to Donald Peterson.
11/19/2010	Kevin Bayley	0.40	Other/Miscellaneous	E-mail to Melinda re: new tasks.
11/22/2010	Kevin Bayley	1.00	Call/Conference Call with/re:	Call with expert, Melinda re: report drafting.
11/22/2010	Kevin Bayley	0.30	Other/Miscellaneous	E-mails with expert re: new materials.
11/22/2010	Kevin Bayley	0.50	Review Documents/Records	Review of discovery looking at Count Sheets, other counts.
11/23/2010	Kevin Bayley	0.30	Call/Conference Call with/re:	Status call, Ben and I were the only ones who dialed in, so we postponed.
11/23/2010	Kevin Bayley	0.40	Prepare for Meeting	Prepare documents for meeting with clients.
11/23/2010	Kevin Bayley	0.50	Review Documents/Records	Review file and e-mails from Matthew/Melinda re: complaints by Grigsby.
11/23/2010	Kevin Bayley	0.90	Travel	Trip to jail to visit with clients Carlos Ortiz and Joe Gonzalez.
11/23/2010	Kevin Bayley	2.20	Travel	Waiting for/meeting with Carlos Ortiz/Joe Gonzalez.
11/24/2010	Kevin Bayley	0.80	Draft/Edit Correspondence/Memo	Records request letters for Ortiz/Gonzalez.
11/24/2010	Kevin Bayley	0.40	Other/Miscellaneous	Internal e-mails re; upcoming deadlines.
11/24/2010	Kevin Bayley	1.60	Review Documents/Records	Review new batch of documents (from 2008 expert visits) sent by Melinda to Dr. Hill.
11/28/2010	Kevin Bayley	0.30	Other/Miscellaneous	E-mail to Melinda re: Johnson tasks for the week.
11/29/2010	Kevin Bayley	0.20	Call/Conference Call with/re:	Dr. Hill re: progress on report.
11/29/2010	Kevin Bayley	1.00	Meeting with/re:	Meeting with Donald Peterson re: verification of requests for production/requests for admission.
11/29/2010	Kevin Bayley	0.20	Meeting with/re:	Melinda re: progress of Hill's report.
11/29/2010	Kevin Bayley	7.80	Travel	To/From Wasco State Prison to meet with Donald Peterson re: verification of requests for production/requests for admission.
11/30/2010	Kevin Bayley	2.10	Draft/Edit Correspondence/Memo	Summarization of points in Dr. Hill draft report.

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11/30/2010	Kevin Bayley	0.60	Meeting with/re:	Meeting with Melinda re: draft of Dr. Hill report.
11/30/2010	Kevin Bayley	0.20	Other/Miscellaneous	E-mails with Matthew Strugar re: trip to Wasco on 11/29.
12/2/2010	Kevin Bayley	2.40	Draft/Edit Correspondence/Memo	Dr. Hill report to court.
12/2/2010	Kevin Bayley	0.40	Other/Miscellaneous	E-mails re: inmate newly de-classed & injured.
12/2/2010	Kevin Bayley	0.50	Review Correspondence/Memo	Logan Hopper report.
12/2/2010	Kevin Bayley	0.80	Review Discovery Responses	Newly produced docs by D.
12/3/2010	Kevin Bayley	0.50	Call/Conference Call with/re:	With MB/Dr. Hill re: latest report draft.
12/3/2010	Kevin Bayley	4.50	Deposition	Of Commander Fender.
12/3/2010	Kevin Bayley	2.50	Draft/Edit Correspondence/Memo	Draft comments to Dr. Hill re: report draft.
12/3/2010	Kevin Bayley	1.00	Meeting with/re:	Discussing Dr. Hill report with Melinda.
12/4/2010	Kevin Bayley	3.60	Review Documents/Records	Medical records for use in Hill report.
12/5/2010	Kevin Bayley	3.20	Draft/Edit Correspondence/Memo	Edits to Dr. Hill report.
12/6/2010	Kevin Bayley	0.30	Call/Conference Call with/re:	Call to Dr. Hill re: report.
12/6/2010	Kevin Bayley	1.10	Draft/Edit Correspondence/Memo	Edits to report following comments by Melinda.
12/6/2010	Kevin Bayley	0.50	Draft/Edit Correspondence/Memo	Attaching documents, sending report to Justin.
12/6/2010	Kevin Bayley	0.40	Meeting with/re:	Meeting with Melinda re: comments to Dr. Hill report.
12/6/2010	Kevin Bayley	1.20	Review Correspondence/Memo	Reviewing Armstrong remedial plan.
12/7/2010	Kevin Bayley	0.80	Call/Conference Call with/re:	Call with co-counsel re: status of case.
12/7/2010	Kevin Bayley	0.80	Other/Miscellaneous	Collecting new documents re: report.
12/7/2010	Kevin Bayley	0.60	Other/Miscellaneous	Discussing new documents for report with co-counsel, MB.
12/7/2010	Kevin Bayley	0.50	Other/Miscellaneous	E-mails with Melinda, Dr. Hill re: billing.
12/7/2010	Kevin Bayley	0.40	Review Pleading/Brief	Review filing re: expert report.

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12/8/2010	Kevin Bayley	1.40	Review Correspondence/Memo	Reading Logan Hopper report.
12/8/2010	Kevin Bayley	0.40	Review Correspondence/Memo	E-mails setting meeting for next week.
12/10/2010	Kevin Bayley	0.80	Review Correspondence/Memo	Discussion with co-counsel re: medical records.
12/13/2010	Kevin Bayley	0.30	Review Correspondence/Memo	E-mails with colleagues re: Melinda's absence.
12/14/2010	Kevin Bayley	0.50	Other/Miscellaneous	E-mails re: billing for expert.
12/14/2010	Kevin Bayley	0.30	Review Correspondence/Memo	Review meet and confer letter from MS to County.
12/14/2010	Kevin Bayley	1.20	Review Correspondence/Memo	Review notes from TH calls to plan for next interrogatories.
12/14/2010	Kevin Bayley	1.60	Review Pleading/Brief	Reading opposition to class cert, accompanying decs.
12/15/2010	Kevin Bayley	0.30	Draft/Edit Correspondence/Memo	Edits to chart of medical records.
12/15/2010	Kevin Bayley	2.20	Meeting with/re:	At LA County Jail meeting with Carlos Ortiz re: recent de-class issues.
12/15/2010	Kevin Bayley	1.40	Meeting with/re:	Meeting at Winston re: case updates, legal strategy.
12/15/2010	Kevin Bayley	1.10	Travel	To/from meeting at Winston.
12/16/2010	Kevin Bayley	3.40	Draft/Edit Discovery	Discovery requests for info re: medical systems.
12/16/2010	Kevin Bayley	1.40	Legal Research	PLRA issues.
12/16/2010	Kevin Bayley	0.60	Review Correspondence/Memo	Discussion with co-counsel re: PLRA issues.
12/21/2010	Kevin Bayley	0.50	Review Correspondence/Memo	E-mails re: latest brief.
12/21/2010	Kevin Bayley	0.50	Review Correspondence/Memo	E-mails re: discovery disputes with defendants.
12/21/2010	Kevin Bayley	1.30	Review Documents/Records	Review of Gonzalez records from LCMC.
12/21/2010	Kevin Bayley	2.40	Review Documents/Records	Ortiz medical records.
12/21/2010	Kevin Bayley	0.80	Review Pleading/Brief	Reply brief on class cert motion.

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12/22/2010	Kevin Bayley	0.50	Review Correspondence/Memo	E-mails re: discovery disputes with defendants.
12/23/2010	Kevin Bayley	2.20	Review Discovery Responses	Reading Fender/Yim depo transcripts.
12/29/2010	Kevin Bayley	0.80	Review Pleading/Brief	Draft stipulation re: discovery cut-off, other discovery disputes.
12/30/2010	Kevin Bayley	3.20	Review Correspondence/Memo	Review documents re: Dr. Hill.
1/3/2011	Kevin Bayley	0.20	Other/Miscellaneous	review minute order from judge continuing hearings.
1/3/2011	Kevin Bayley	0.50	Other/Miscellaneous	Review interrogatories to named plaintiffs.
1/4/2011	Kevin Bayley	0.30	Meeting with/re:	Melinda re: depositions.
1/4/2011	Kevin Bayley	0.50	Other/Miscellaneous	E-mails with co-counsel re: prospective new clients.
1/4/2011	Kevin Bayley	1.00	Other/Miscellaneous	Call with litigation team re: current state of litigation.
1/4/2011	Kevin Bayley	0.10	Review Correspondence/Memo	E-mail from Shawna Parks to opposing counsel re: expert reports.
1/6/2011	Kevin Bayley	2.00	Meeting with/re:	Meeting at DRLC with Matthew, Shawna, Jessica, Melinda re: 1/12 hearing on class cert motion.
1/6/2011	Kevin Bayley	0.50	Meeting with/re:	Melinda re: case assignments.
1/7/2011	Kevin Bayley	0.80	Other/Miscellaneous	E-mails with co-counsel re: client claims/exhaustion/Monday visit.
1/7/2011	Kevin Bayley	0.40	Other/Miscellaneous	E-mail passed along by co-counsel with D's response to discovery issues.
1/7/2011	Kevin Bayley	2.10	Other/Miscellaneous	Review Dr. Hill declaration from receivership, other materials.
1/7/2011	Kevin Bayley	2.30	Other/Miscellaneous	Review of PRLA cases from prison law materials.
1/10/2011	Kevin Bayley	1.30	Other/Miscellaneous	Review e-mails re: inviting DOJ to participate in case (0.4). Reading Miller case (.9).
1/10/2011	Kevin Bayley	3.80	Other/Miscellaneous	Visit to jail to meet with White and Gonzalez. Travel (above normal commute (.5). Waiting at attorney room and visiting with clients (3.3).
1/10/2011	Kevin Bayley	1.10	Other/Miscellaneous	Reviewing notes from client meetings (.2), drafting e-mail to Shawna/Matt re: new info (.9).
1/11/2011	Kevin Bayley	0.90	Other/Miscellaneous	Telephonic moot for class cert hearing.
1/11/2011	Kevin Bayley	1.90	Other/Miscellaneous	Review class cert pleadings to prep for moot/hearing.
1/12/2011	Kevin Bayley	2.80	Court Appearance	For class certification. Waiting for hearing (2.2). In chambers (.3). Hearing (.3)
1/12/2011	Kevin Bayley	0.60	Travel	To/from hearing (above normal commute).

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1/14/2011	Kevin Bayley	0.70	Other/Miscellaneous	E-mails with co-counsel re: HIPPA releases (.2). Research re: HIPPA (0.5).
1/14/2011	Kevin Bayley	0.40	Other/Miscellaneous	Call with Dr. Hill re: special master, case progress.
1/14/2011	Kevin Bayley	0.50	Other/Miscellaneous	E-mails with co-counsel re: special master choices.
1/14/2011	Kevin Bayley	1.10	Prepare for Deposition	Review MB depo prep materials.
1/18/2011	Kevin Bayley	0.60	Call/Conference Call with/re:	Calls to Jessica Price re: Kwan depo prep, identifying clients for examinations.
1/18/2011	Kevin Bayley	0.40	Call/Conference Call with/re:	Status conference call with Shawna, no one else showed up.
1/18/2011	Kevin Bayley	0.30	Draft/Edit	Medical records chart updates.
1/18/2011	Kevin Bayley	0.30	Other/Miscellaneous	E-mails following up on status call.
1/18/2011	Kevin Bayley	0.30	Other/Miscellaneous	E-mail to Melinda re: tasks.
1/18/2011	Kevin Bayley	0.40	Other/Miscellaneous	E-mails re: details of payment for Dr. Hill.
1/18/2011	Kevin Bayley	1.00	Other/Miscellaneous	E-mails re: medical records requests, setting up call to discuss.
1/18/2011	Kevin Bayley	2.60	Prepare for Deposition	For deposition of Captain Kwan.
1/19/2011	Kevin Bayley	0.60	Other/Miscellaneous	Internet searches re: special master candidates.
1/19/2011	Kevin Bayley	0.50	Other/Miscellaneous	E-mails with expert, accounting re: paying expert.
1/19/2011	Kevin Bayley	2.40	Prepare for Deposition	Review of Fender transcript. Review of Jessica Price notes on Fender transcript.
1/21/2011	Kevin Bayley	1.10	Other/Miscellaneous	Review of case notes,.
1/24/2011	Kevin Bayley	0.10	Call/Conference Call with/re:	Call to Matt Strugar re: depo scheduling.
1/24/2011	Kevin Bayley	0.30	Other/Miscellaneous	E-mail to Melinda re: case assignments.
1/24/2011	Kevin Bayley	0.20	Other/Miscellaneous	E-mails with Ben Gipson re: paying Dr. Hill.
1/24/2011	Kevin Bayley	2.20	Other/Miscellaneous	Reading pressure ulcer and moral hazard articles from Dr. Hill.
1/26/2011	Kevin Bayley	0.80	Other/Miscellaneous	Separating case notes/research for filing, reading.
1/26/2011	Kevin Bayley	0.50	Other/Miscellaneous	Review of draft report to court re: special master.
1/28/2011	Kevin Bayley	0.60	Other/Miscellaneous	Meetings with Melinda re: case assignments (.3/.3).
1/31/2011	Kevin Bayley	0.40	Legal Research	Research into articles requested by Melinda, briefly reading each.
1/31/2011	Kevin Bayley	0.70	Other/Miscellaneous	Calls with Matthew Strugar (.1 re: medical records, .1 re: depo scheduling, .1 re: request letters/language); e-mail to Matthew Strugar (.1 re sample medical request letters); e-mails to paralegal re: tasks .3.
2/1/2011	Kevin Bayley	0.40	Other/Miscellaneous	Status call. Held on the line for a bit, but cancelled.

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2/1/2011	Kevin Bayley	0.30	Other/Miscellaneous	E-mails with co-counsel re: scheduling of Kwan depo.
2/2/2011	Kevin Bayley	1.20	Other/Miscellaneous	Reviewing task list (.2), meeting with paralegal re: case (.3). Drafting notes re: tasks (.7).
2/2/2011	Kevin Bayley	2.70	Other/Miscellaneous	Review of MB depo outlines to prep for Kwan. Comparing outline with Fender depo.
2/3/2011	Kevin Bayley	0.30	Other/Miscellaneous	E-mails re: payment for expert.
2/4/2011	Kevin Bayley	7.40	Other/Miscellaneous	Drafting Depo outline from Kwan outline (5.1). Reviewing depo transcripts from earlier depositions (2.3).
2/7/2011	Kevin Bayley	0.70	Other/Miscellaneous	Transcribing notes from client interviews.
2/7/2011	Kevin Bayley	2.20	Other/Miscellaneous	Legal research re: Armstrong case remedial plan, case history, to prep for depo.
2/7/2011	Kevin Bayley	1.40	Other/Miscellaneous	Review of law review articles re: claims in prison cases.
2/8/2011	Kevin Bayley	0.60	Other/Miscellaneous	E-mails with co-counsel re: scheduling, logistics of Kwan deposition (.5). Phone call with Jessica Price re: same (.1).
2/8/2011	Kevin Bayley	0.40	Other/Miscellaneous	Review of ADA materials on LASD website.
2/8/2011	Kevin Bayley	0.40	Other/Miscellaneous	Reviewing class member declarations for depo prep.
2/8/2011	Kevin Bayley	4.20	Prepare for Deposition	Draft outline for Kwan deposition. (draft outline eaten by computer)
2/8/2011	Kevin Bayley	0.40	Review Pleading/Brief	Pleading, declarations re: retaliation in Rutherford.
2/9/2011	Kevin Bayley	2.40	Other/Miscellaneous	Reading materials from libraries re: depo prep, technique.
2/10/2011	Kevin Bayley	2.30	Other/Miscellaneous	Legal research re: privilege issues (1.8). Research re: depo technique articles (.5).
2/13/2011	Kevin Bayley	2.60	Other/Miscellaneous	E-mails with co-counsel re: depo logistics (.3). Reading articles re: depo technique, prep (2.3).
2/14/2011	Kevin Bayley	0.80	Other/Miscellaneous	Call with Jessica/Melinda re: Kwan depo.
2/14/2011	Kevin Bayley	0.40	Other/Miscellaneous	Meeting with Candis re: privilege issues.
2/14/2011	Kevin Bayley	1.20	Other/Miscellaneous	Legal research re: privilege issues.
2/14/2011	Kevin Bayley	6.40	Prepare for Deposition	Working on outline.
2/15/2011	Kevin Bayley	0.30	Call/Conference Call with/re:	Calls, e-mail with Matthew Strugar re: court reporter logistics for depo.
2/15/2011	Kevin Bayley	0.80	Other/Miscellaneous	Status call with Jessica, Ben, Matthew present. Re: upcoming depositions, file organization.
2/15/2011	Kevin Bayley	7.10	Other/Miscellaneous	Meet with Melinda/CB/CWB/RS re: depo issues (.5). Prep for depo (6.6)

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2/16/2011	Kevin Bayley	0.60	Call/Conference Call with/re:	Call to (.1), voicemail from (0.1) Jessica Price re: attendance at depo. Calls with Matthew Strugar re: attendance at depo (.1), PMK designations (0.1), Recap of depo (.2).
2/16/2011	Kevin Bayley	6.20	Deposition	Deposition of Michael Kwan at DRC offices.
2/16/2011	Kevin Bayley	0.20	Other/Miscellaneous	E-mail to Melinda Bird, Jessica Price re: depo recap.
2/16/2011	Kevin Bayley	1.20	Prepare for Deposition	Prepare/review documents for deposition of Michael Kwan.
2/21/2011	Kevin Bayley	0.50	Other/Miscellaneous	Reviewing joint stip re: special master and providing comments, e-mails from co-counsel re: same.
2/22/2011	Kevin Bayley	0.50	Other/Miscellaneous	Review materials from Dr. Hill re: LTC in prison system.
2/22/2011	Kevin Bayley	0.80	Review Documents/Records	Reviewing medical reports from Dr. Hill in Coleman case.
2/24/2011	Kevin Bayley	2.80	Other/Miscellaneous	Reading of Complaint, Motion for class cert, answer and opposition to prepare information on our claims.
2/25/2011	Kevin Bayley	7.30	Legal Research	Legal research on difference between ADA and 8th amendment claims re: medical care in prisons and jails.
2/27/2011	Kevin Bayley	3.40	Legal Research	Legal research on standards for ADA cases, medical needs cases.
2/28/2011	Kevin Bayley	7.40	Other/Miscellaneous	Reading Armstrong decisions (2.4). Drafting claims chart (3.8). E-mails re: postponing call (0.3). Reviewing 8th amendment claims (.9).
3/1/2011	Kevin Bayley	3.60	Other/Miscellaneous	Researching peer review issues (1.3). Drafting peer review memo (1.7). Reviewing discovery produced by D's for privilege log, privilege claims (0.6).
3/2/2011	Kevin Bayley	2.20	Legal Research	Legal research: medical claims under ADA/8th/14th amendments.
3/2/2011	Kevin Bayley	5.90	Other/Miscellaneous	Review of Kwan depo transcript (2.4). Conversations with co-counsel re: payment for court reporter, handling of original (0.3/0.2). Speaking with paralegal re: filing of transcript, dealing with DRLC re: payment, etc. (0.2). E-mails re: named plaintiff depositions (0.3). Legal research on responding to privilege claims (2.5).
3/3/2011	Kevin Bayley	1.80	Legal Research	Reviewing Armstrong and Graves findings of fact.
3/3/2011	Kevin Bayley	0.60	Other/Miscellaneous	E-mails with co-counsel re: Kwan deposition transcript (.3). Current litigation issues (.3).
3/3/2011	Kevin Bayley	0.90	Other/Miscellaneous	Made edits to proof chart.
3/4/2011	Kevin Bayley	5.80	Other/Miscellaneous	Developing draft findings of fact from multiple case law sources, our complaint, declarations, expert reports.

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3/4/2011	Kevin Bayley	0.40	Other/Miscellaneous	E-mails setting next case call.
3/6/2011	Kevin Bayley	1.30	Draft/Edit Correspondence/Memo	Memo to co-counsel re: current state of case.
3/7/2011	Kevin Bayley	6.50	Other/Miscellaneous	Call with co-counsel (1.3). E-mails re: current state of case (.3). Drafting peer review section for meet and confer letter (.8). Legal research on peer review (0.3). E-mails to co-counsel re: peer review issues (.2). Reading re: defending depositions (1.6). E-mails with co-counsel re: status of medical records requests (0.5). Legal research re: official information privilege (1.4). E-mails from co-counsel re: possible special masters (.1).
3/7/2011	Kevin Bayley	0.60	Other/Miscellaneous	Correspondence with co-counsel re: special master process, candidates (0.2). Research re: candidates (.4)
3/8/2011	Kevin Bayley	2.40	Other/Miscellaneous	Drafting findings of fact.
3/8/2011	Kevin Bayley	1.90	Other/Miscellaneous	Research re: impact of state plan to send more inmates back to counties (1.1); Review county website for budget materials (.8).
3/8/2011	Kevin Bayley	1.00	Other/Miscellaneous	E-mails re: protective order (.2). Reviewing sample protective order (.3). Reviewing information re: possible masters (.5).
3/9/2011	Kevin Bayley	3.70	Other/Miscellaneous	Meeting with Jessica Price re: upcoming tasks on medical claims, workplan for case (0.9). Travel to and from ACLU for depo prep session (.6). Meeting with Peter Eliasberg re: defending depositions (1.6). Review of meet and confer letter from Matthew Strugar to opposing counsel (0.3). E-mails re: depo prep session (0.3).
3/9/2011	Kevin Bayley	1.50	Other/Miscellaneous	Meeting with Melinda re: difficulties with document retrieval (.03). E-mail to Matthew Strugar re: meet and confer on discovery issues (0.1). Attempting to access case materials on Winston site (0.3). Edits to draft findings of fact (0.8).
3/11/2011	Kevin Bayley	2.00	Other/Miscellaneous	Review of D's response to 3rd request for production (0.6). Research re: need for privilege log (1.2). E-mails re: special master candidates (0.2).
3/11/2011	Kevin Bayley	0.20	Other/Miscellaneous	T/C with Matthew Strugar re: D's discovery responses, expert Terry Hill.
3/11/2011	Kevin Bayley	0.30	Other/Miscellaneous	Review of privilege assertions in all of D's responses to request for production.

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3/14/2011	Kevin Bayley	4.70	Other/Miscellaneous	Call with co-counsel re: next steps to take (1.2). Typing notes from call, sending to group (0.3). E-mails re: medical files requested with co-counsel (0.3). Review stipulation for in-custody depositions of plaintiffs (0.1). Review new title II regulations for ways they might impact case (0.8). Review Joe Gonzalez medical records to prep for depo defense (0.5). Review NITA materials on depositions (1.1). Discuss record review with paralegal (0.4).
3/15/2011	Kevin Bayley	0.20	Other/Miscellaneous	E-mails re: special master motion drafting.
3/16/2011	Kevin Bayley	7.20	Other/Miscellaneous	Researching compensation of special masters generally and in disability cases (4.2). Meeting with Matthew Strugar and Jessica Price re: depo defense for plaintiffs depositions (1.3). Drafting notes re: Gonzalez depo (1.1). Drafting records request letter, speaking with paralegal re: sending (0.6).
3/17/2011	Kevin Bayley	0.40	Other/Miscellaneous	E-mails with paralegal re: Wasco and Corcoran contact (0.2). E-mails with Matthew Strugar/Jason Hamilton re: client contact (0.2).
3/18/2011	Kevin Bayley	8.20	Other/Miscellaneous	Review of law review articles re: use of masters (2.3). Review of motion to appoint special master drafted by Melinda (0.4). Legal research re: PLRA issues related to use of special masters (3.2). Meeting with Melinda Bird re: PLRA issues with special masters (0.5). Drafting memo re: PLRA/special masters (1.3). Review chart of Gonzalez medical records put together by paralegal (0.2). Review of depo outline from Matthew Strugar (0.3).
3/19/2011	Kevin Bayley	1.40	Other/Miscellaneous	Drafting chart of discovery not yet received from D (1.4).
3/20/2011	Kevin Bayley	4.70	Other/Miscellaneous	Editing draft of motion for special master (1.2). Drafting chart of discovery not yet received from D (3.1). Drafting e-mail to co-counsel re: PLRA considerations re: special master appointment (0.4)
3/21/2011	Kevin Bayley	6.20	Other/Miscellaneous	Weekly call with co-counsel (1.0). Meeting with Melinda re: case progress (0.3). Research re: drafting of joint stipulation for discovery issues (3.4). Begin drafting joint stip (0.6). E-mails with co-counsel re: PLRA issues with special master (0.4). E-mails with Matthew Strugar/opposing counsel re: meeting and conferring on discovery issues (0.3). Call with Matthew Strugar re: handling meeting and confer with opposing counsel on discovery issues (0.2).

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3/22/2011	Kevin Bayley	1.60	Other/Miscellaneous	Discussing deposition schedule with Melinda (.02). Discussing depo schedule with Melinda/Dara (0.2). E-mails with Matthew Strugar re: discovery joint stip (.2), depo schedule (.2). With Matthew and opposing counsel re: Rule 37 meet and confer (.3). Reviewing info from Winston, co-counsel e-mails re: new magistrate (.4). E-mails from co-counsel re: potentially dropping one plaintiff (.1).
3/23/2011	Kevin Bayley	5.60	Other/Miscellaneous	E-mails with Matthew Strugar re: possible meet and confer (0.3). Travel to/from DRLC for Meet and Confer with opposing counsel (1.0). Meet and confer (0.9). Meeting with Matthew Strugar re: medical files, transferring files (1.2). Drafting joint stip sections on disputed requests (1.4). Talking, calls, e-mails with paralegal re; filling in joint stip section (0.4). Review Jessica Price edits to findings of fact (0.4).
3/24/2011	Kevin Bayley	2.10	Other/Miscellaneous	Attending Rutherford hearing (1.7). Discussing hearing/Johnson with Peggy Winter (.4).
3/24/2011	Kevin Bayley	0.90	Other/Miscellaneous	Phone calls with Matthew Strugar (.2, .1) and Jessica Price (.1) and with both (.3) to plan depo schedule for upcoming plaintiff depositions, witness prep. E-mails re: same with same co-counsel (.2)
3/25/2011	Kevin Bayley	5.80	Other/Miscellaneous	E-mails with co-counsel re: plans for plaintiff deposition logistics with CDCR (0.3). Drafting letter to Corcoran litigation department re: request for visit (0.7). E-mails with Rita re: sending letter (0.2). Preparing for depo prep session with Joe Gonzalez (1.3). Research re: motion to compel discovery (2.1). Meeting with Melinda re; discovery issues (0.8). E-mailing co-counsel re: Monday meeting/call (0.2). Call with Matthew Strugar re: need for protective order for medical records (0.2).
3/26/2011	Kevin Bayley	2.60	Other/Miscellaneous	Drafting letter re: claims to opposing counsel (.8). Reviewing discovery requests (.5). Drafting meet and confer letter to opposing counsel (.8). Reviewing sample meet and confer letters (0.5).
3/27/2011	Kevin Bayley	1.90	Other/Miscellaneous	Drafting Meet and Confer letter on discovery issues (.5). Legal research re: limits of discovery (1.4)

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3/28/2011	Kevin Bayley	7.00	Other/Miscellaneous	Drafting meet and confer letter re: discovery issues (1.8). Meeting with Derrick White (1.6) and Joe Gonzalez (1.4) at MCJ to prep them for depositions. Drafting outline for Gonzalez prep (0.4). E-mails with co-counsel setting up call (0.2). Call with co-counsel re: status of discovery, special master (1.0). Meeting with Melinda re: depo schedule (0.2). E-mails with co-counsel re: status of records of Joe Gonzalez (0.4). Meeting with Rachel and Melinda re: Rachel's re-joining the case/current status of the case (0.2).
3/29/2011	Kevin Bayley	6.50	Other/Miscellaneous	Revising Meet and Confer letter and prepping for sending (1.6). Revising medical claims and prepping for sending (0.8). Revising discovery not received table (1.1). Call with Matthew Strugar re: 30b6 designations of Kwan (0.1)/re: depo schedule (0.3)/re: letter to opposing counsel (0.1)/re: September meet and confer with opposing counsel (0.2). Reviewing 30b6/Kwan depo topics (0.3). E-mails with co-counsel/opposing counsel re: deposition schedule (0.9). Call with opposing counsel re: deposition schedule (0.2). Review MB draft letter re: special master (0.3). Review materials from MB re: court-appointed expert (0.3). E-mails with co-counsel re: deposition logistics (0.3). Call with SATF re: clearance for visit (0.2). Call with Jessica Price re: CDCR clearance (0.1).
3/30/2011	Kevin Bayley	5.10	Other/Miscellaneous	Meeting with Melinda and new law clerk Ella re: case, Ella's work (0.6). Meeting with Melinda re: discovery issues (0.3); call with opposing counsel re: deposition schedule (0.1). Drafting calendar of depo schedule (0.2). Verifying Justin received letters on 3/29 (0.3). Review fax from CDCR re: visit (0.1). Drafting outline of possible questions by defendants in plaintiff depositions (1.4). Reviewing Peter Johnson medical records/declaration to prepare for deposition on 4/1 (1.5). Review of draft findings of fact/case chart by Jessica Price (0.6).
4/1/2011	Kevin Bayley	0.20	Other/Miscellaneous	E-mails with Jessica Price re: getting clearance for Corcoran visits for depositions of Curfman/Grigsby.

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4/1/2011	Kevin Bayley	6.30	Other/Miscellaneous	Attend deposition of named plaintiff Peter Johnson (5.5). Meeting with Matthew Strugar and Jessica Price re: case staffing, developments (0.4/0.2). Meeting with opposing counsel Justin Clark re: discovery issues (0.2).
4/4/2011	Kevin Bayley	5.20	Other/Miscellaneous	Call with co-counsel (.5). Review of Kwan depo re: Armstrong standards (.4). Drafting letter re: discovery issues (1.6). Drafting joint stipulation (1.2). Review of materials produced (.3). Discussions with co-counsel, support staff re: universe of materials (.4). Reviewing notes from Johnson depo, e-mailing co-counsel re: same (.3). Reviewing materials to prepare for Gonzalez depo (.3). Call with Jessica Price re: prep of White, privilege issues (.2).
4/4/2011	Kevin Bayley	0.70	Other/Miscellaneous	E-mails with co-counsel re: spousal privilege (.2). With Ella Hushagen re: upcoming depositions (.2). With Jessica Price re: logistics for trip to Corcoran (.2). paralegal re: logistics for Corcoran trip (.1).
4/5/2011	Kevin Bayley	4.60	Deposition	Attending deposition of named plaintiff Andre Butler.
4/5/2011	Kevin Bayley	1.20	Other/Miscellaneous	Phone call with Matthew Strugar re: White deposition (.3), Salinas Valley clearance (0.2). Filling out forms re: Salinas Valley clearance (0.2). Discussing sending of forms with Rosa Alas (0.2). E-mail to Matthew Strugar re: draft joint stipulation re: discovery issues (0.1). E-mails with support staff, DRLC re: discovery responses (0.1), prison visit logistics (0.1).
4/5/2011	Kevin Bayley	0.50	Other/Miscellaneous	Travel to/from White depo (above normal commute).
4/5/2011	Kevin Bayley	1.10	Prepare for Deposition	Preparing Joe Gonzalez for 4/6 deposition.
4/6/2011	Kevin Bayley	0.30	Other/Miscellaneous	Travel to Gonzalez depo (above normal commute).
4/6/2011	Kevin Bayley	4.20	Other/Miscellaneous	Attend deposition of Joe Gonzalez (includes time at jail waiting for inmate).

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4/6/2011	Kevin Bayley	3.60	Other/Miscellaneous	E-mails/calls with Matthew Strugar re: privilege issues/correspondence with defendant's counsel for joint stipulation (0.5). Reviewing correspondence with defendant's counsel (0.4). Reviewing legal research on privilege issues (0.9). Reviewing Jessica Price chart on discovery we have not yet received (0.2). Reviewing chart by Ella Hushagen of falls by plaintiffs/declarants (0.3) E-mails with Ella/Melinda/paralegal re: next steps in falls data analysis (0.2). Drafting letter to Defendant's counsel re: discovery issues (0.8)/discussing letter with co-counsel (0.3)(letter sent on same date).
4/7/2011	Kevin Bayley	0.50	Other/Miscellaneous	E-mails with Matthew Strugar re: our need for QA data (.3). Calls to Matthew Strugar re: need for QA data (0.2).
4/8/2011	Kevin Bayley	8.10	Other/Miscellaneous	Drafting sections of joint stipulation re: discovery issues (4.8). Phone calls with Matthew Strugar re: joint stipulation (.6). Legal research for joint stipulation (1.7). E-mails with Jessica Price re: logistics for 4/11 visit to Corcoran (.6). Filling out agency paperwork, obtaining sign-off for car rental for 4/11 visit to Corcoran (.4).
4/10/2011	Kevin Bayley	3.20	Prepare for Deposition	Reviewing records of Columbus Grigsby (2.6). Drafting depo defense notes (.6).
4/11/2011	Kevin Bayley	11.10	Other/Miscellaneous	Travel to/from Corcoran SATF to prep named plaintiffs for deposition (5.4). Meeting with Michael Curfman to prep him for 4/15 depo (2.3). Meeting with Columbus Grigsby to prep for 4/15 depo (2.0). Weekly status call with co-counsel (.8). Discussing different strategies re: upcoming depositions with Jessica Price (.6).

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4/12/2011	Kevin Bayley	2.70	Other/Miscellaneous	E-mails with co-counsel, opposing counsel re: scheduling for Tavakoli deposition, discovery issues call and exhibits for depositions later in the week (0.4). Review of discovery requests drafted by co-counsel (requests for admission (0.3), requests for production (0.2), list of D's witnesses (0.1). Meeting with Rachel Scherer/Melinda Bird re: Rachel's meeting with Derrick/possible retaliation issues (0.4). Review of Derrick White's medical records for occasions "seen walking" and sending to RS/MB (0.4). Review of Carlos Ortiz LASD info (0.1). E-mail with paralegal re; locating Carlos Ortiz's PD (0.1). E-mail from opposing counsel re: discovery joint stipulation (0.2). E-mail to co-counsel re: opposing counsel's issues with our portion of discovery joint stipulation (0.2). E-mails with co-counsel re: timing of site inspection, reviewing of draft letter by co-counsel re: site inspection (0.3).
4/13/2011	Kevin Bayley	3.60	Other/Miscellaneous	Drafting letter re: Rachel's difficulties at attorney room (0.9). Review of Rachel Scherer edits to letter (0.2). E-mails with co-counsel re: joint stip/discovery process (0.6). Drafting e-mail to opposing counsel re: discovery issues (0.5). Call with Dr. Hill re: upcoming site inspection, medical exams (0.4). Reviewing Hill Pelican Bay report (0.3). Calls/e-mails with Jessica Price re: confirming 4/15 visit to Corcoran for depositions and logistics for trip (0.3). Reviewing settlement agreement of Wisconsin case provided by Melinda Bird (0.4). Review of notes from prior depositions to prepare for Grigsby/Curfman depositions (0.4).
4/14/2011	Kevin Bayley	1.80	Other/Miscellaneous	At court for Carlos Ortiz criminal hearing (.7). Travel to/from court for hearing (above normal commute)(.5). Meeting with his appointed criminal attorney (0.2). Reviewing MB edits to letter (0.2). E-mails re: letter on retaliation (0.2).
4/15/2011	Kevin Bayley	14.20	Other/Miscellaneous	Travel to/from co-counsel's house to go to depositions (1.4). Travel to/from Corcoran for depositions (5.1). Deposition of Columbus Grigsby (3.2). Deposition of Michael Curfman (2.2). Time spent getting through prison security, waiting between depositions, etc. (2.3).

4/18/2011	Kevin Bayley	2.20	Other/Miscellaneous	Call with Rachel re: her meetings with Derrick/Carlos (0.1). Meeting with Rachel pre-meeting (0.1). E-mails with co-counsel re: delay in discovery joint stip (0.3). Research into calculating dates for filing (0.5). E-mails from opposing counsel re: religious holiday observance necessitating delay in provision of their portion of joint stip (0.2). Call with Matthew Strugar re: plaintiff depo reports (0.2) and upcoming depo schedule (0.1). E-mail to Fresno staff re: local PT (0.2). Review of letter from Beach re: neutral (0.2), MB draft response (0.1) and e-mails from co-counsel re: same (0.2).
4/19/2011	Kevin Bayley	1.40	Other/Miscellaneous	Meeting with Rachel re: upcoming depo schedule (0.1). Updating Melinda on 4/15 depositions (0.1). Meeting with Rachel re: info from her visit to Carlos Ortiz (0.1). Thinking through current issues in case, drafting agenda for 4/20 meeting based on those (0.5). E-mails with Matthew Strugar re: signed verification forms (0.2). E-mails with Matthew Strugar re: upcoming depo schedule (0.2). review draft of MB letter to Beach re: mediator, list of mediator possibles (0.2).
4/20/2011	Kevin Bayley	4.40	Other/Miscellaneous	Prepare for meeting with co-counsel (0.2). Meeting with co-counsel re: current case direction (2.0). Meeting with Jessica Price (0.1). Meeting with paralegal re: Melinda Bird letter to Paul Beach re: neutral, edits to letter (0.1). Reviewing above letter (0.3). Calls to Shawna Parks (0.1) and Melinda Bird (0.1) re: letter. Meeting with Ella re: records review (0.3). Meeting with Ella re: results of first records review (0.1). E-mails to paralegal re: calendaring Motion dates (0.1)/Joint stipulation tasks (0.1). E-mail from Justin Clark re: depo dates (0.1). Typing up notes from morning's meeting (0.6). E-mails from co-counsel re: retaliation order (0.1)/30b6 designees (0.1).
4/21/2011	Kevin Bayley	0.80	Other/Miscellaneous	E-mails from/to Rachel re: letter to Justin Clark re: complaints in attorney room (0.1). E-mails with Matthew Strugar re: e-mail exchanges with Justin Clark re: attorney room (0.2). E-mail from Shawna Parks re: letter to Beach re: master/neutral (0.1). Reviewing Finding of fact comparison between Johnson, other cases done by Jessica Price (0.4).

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4/21/2011	Kevin Bayley	1.60	Other/Miscellaneous	Review discovery joint stip and related documents from defendant (0.3). E-mails/calls with paralegal re: formatting of document to return to D (0.4). Reviewing letter from D's counsel re: new dates for depositions (0.2). E-mail to co-counsel re: dates for depositions (0.3). Call with Matthew Strugar re: Wallace deposition issues/stip logistics (0.1). Call from Jessica Price re: Derrick White records (0.1). E-mails from/to Jason Hamilton re: transcripts we currently have (0.2).
4/22/2011	Kevin Bayley	4.10	Other/Miscellaneous	Discussing/Working with support staff on formatting discovery joint stipulation (0.4). Meeting with Melinda Bird re: joint stipulation (0.2). Meeting with Melinda Bird re: letter to Justin Clark regarding retaliation/attorney room issues (0.2). Sending e-mail, stip to opposing counsel (0.2). Review of final joint stip (0.9). E-mailing opposing counsel re: Dalton deposition (0.2). E-mail discussion with co-counsel re: defendant depositions (0.4). Reviewing Dr. Hill report, medical records for names of Drs to call instead of Wallace (0.4). Call with PT re: helping on case (0.3). E-mails with Fresno staff re: potential Fresno PT's (0.3). review of case notes, notes from Grigsby/Curfman depositions (0.6).
4/25/2011	Kevin Bayley	0.70	Other/Miscellaneous	Call with co-counsel re: case status.
4/25/2011	Kevin Bayley	0.40	Other/Miscellaneous	Final review, edit of letter to Justin Clark re: attorney room.
4/25/2011	Kevin Bayley	0.60	Other/Miscellaneous	E-mail from opposing counsel re: issues with joint stip (0.1). Talking to Beverly re: joint stip edits (0.1). Editing italics out of stip (0.3). E-mail to opposing counsel attached edited stip (0.1).
4/25/2011	Kevin Bayley	0.20	Other/Miscellaneous	Editing letter to opposing counsel re: retaliation/attorney room issues based on comments from paralegal.
4/25/2011	Kevin Bayley	0.10	Other/Miscellaneous	Meeting with Ella Hushagen re: next set of medical records to review.
4/25/2011	Kevin Bayley	1.40	Other/Miscellaneous	Reading of joint stip, outlining new P&A's.
4/25/2011	Kevin Bayley	1.10	Other/Miscellaneous	E-mails with co-counsel re: San Diego client (0.3). Review of letter from San Diego client (0.2). Review of filed motion (0.2). Call with Melinda Bird, Shawna Parks, Matthew Strugar re: choosing mediator (0.4).
4/25/2011	Kevin Bayley	0.30	Other/Miscellaneous	Typing up notes from call (0.3).

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4/25/2011	Kevin Bayley	0.20	Other/Miscellaneous	Review of local rules 37 re: filing of joint stipulation, other papers on discovery disputes.
4/26/2011	Kevin Bayley	4.80	Other/Miscellaneous	Call with Matthew Strugar re: agreement on depositions (for drafting of supplemental declaration re: motion to compel discovery)(0.2). Call with Matthew Strugar re: safety and security concerns of defendants (for same drafting (0.2). E-mails with opposing counsel and co-counsel re: scheduling deposition of Karen Dalton (0.3). Legal research re: cases from defendant's section of joint stipulation (1.8). Drafting of supplemental points and authorities (2.3)
4/26/2011	Kevin Bayley	1.20	Other/Miscellaneous	reading of more cases cited by D in their portion of joint stipulation.
4/27/2011	Kevin Bayley	7.50	Other/Miscellaneous	Drafting supplemental declaration (6.6). Calls with Jessica Price (0.2), Dr. Hill (0.2) re: medical records/declass issues. Call with Matthew Strugar re: supplemental memo (0.2). E-mails with Matthew Strugar re: supplemental memo (0.3).
4/28/2011	Kevin Bayley	0.40	Other/Miscellaneous	E-mails with co-counsel re: plans for site inspection/medical exams (0.2), ADA complaints at jail (0.2).
4/29/2011	Kevin Bayley	2.70	Other/Miscellaneous	Review of supplemental memorandum, editing (1.2). Review of Derrick White declaration drafts (0.6). Review of Ella Hushagen research re: TRO standards (0.2). Review of ADA remedies article (0.3). E-mailing Jessica Price re: research (0.2). Voicemail from Dr. Hill re: White records (0.1). E-mailing co-counsel re: voicemail (0.1).
5/2/2011	Kevin Bayley	3.50	Other/Miscellaneous	Call with Dr. Hill re: TRO/dec/site inspection (0.2). Call with Jessica Price re: Hill dec for TRO (0.2). Call with co-counsel (0.9). Call to Matthew Strugar re: supplemental memo of P's and A's (0.1). Meeting/e-mailing with Ella Hushagen (0.2) re: records review/new tasks. E-mail to Jessica Price re: TRO thought (0.2). Review of TRO/decs draft (0.8). Review medical records of Dr. Alexander (0.3). Review medical records of Derrick white (0.2). Review medical records of named plaintiffs/class members to find first named of doctor to call for depo (0.4).
5/2/2011	Kevin Bayley	1.20	Other/Miscellaneous	Review of TRO draft (0.4). Medical records of Derrick White (0.8).

5/3/2011	Kevin Bayley	3.30	Other/Miscellaneous	Revising declaration of Dr. Hill (1.4). Reviewing medical records of Derrick White (0.6) and Dr. Alexander (0.4). Phone call with Melinda Bird re: declaration of Dr. Hill (0.3). E-mails with co-counsel re: TRO drafting (0.6).
5/4/2011	Kevin Bayley	5.50	Other/Miscellaneous	Voicemails to/from and Calls with Dr. Hill re: declaration (0.1/0.1/0.2/0.2/0.1). Making corrections to Dr. Hill brief (0.5). Call with Matthew Strugar re: conference line (0.1). Calls with Jessica Price re: medical records for plaintiffs (0.2), briefing schedule (0.1). With Jessica Price and Melinda Bird re: D's offer to settle (0.4). With co-counsel re: finishing briefing, etc. (0.7). Meeting with Ella Hushagen, explaining case and asking her to cite check (0.3). Reviewing P's and A's (1.2). Reviewing Ella's cite checking (0.2). E-mails with co-counsel re: dropping White as plaintiff (0.7). Reviewing other docs to be filed with court (0.4).
5/5/2011	Kevin Bayley	1.30	Other/Miscellaneous	Reviewing/commenting on drafts of press release (0.4). Reviewing drafts of TRO application (0.4). E-mails between co-counsel re: filing process (0.3). E-mails with co-counsel re: Plaintiff depo transcripts (0.2).
5/6/2011	Kevin Bayley	5.50	Other/Miscellaneous	Meeting with Rachel Scherer re: upcoming depositions (0.2). Meetings with Melinda Bird and Rachel Scherer re: upcoming depositions (0.4)(1.9). Memo to co-counsel re: site inspection (0.4). Voicemail to (0.1) and call with Jessica Price re: upcoming depositions (0.2). Calls with Matthew Strugar re: upcoming deposition and site inspection schedule (0.1)(0.1). Meeting with Rachel Scherer re: documents for case (0.2). Research on privilege on settlement (0.8). Call to PT's office re: scheduling assessments (0.2). Voicemail from PT (0.1). Reading final TRO documents (0.4). Reading final press release (0.2). Reading news article re: case against jail on deputy beatings (0.2). Reviewing Gonzalez records, sending to JP (0.2)
5/7/2011	Kevin Bayley	0.50	Other/Miscellaneous	E-mails from co-counsel re: meeting and conferring with opposing counsel re: add'l depos (0.2). Correspondence from opposing counsel, co-counsel re: site inspection for next week, possible responses (0.3).

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5/9/2011	Kevin Bayley	4.00	Other/Miscellaneous	Meeting with Rachel and Jessica re: upcoming doctor depositions (1.6). Meeting with Jessica re: Terry Alexander whereabouts (0.4)/medical records for use in depositions (0.4). Call with Dr. Hill re: visit this week (0.3). Weekly call with co-counsel (0.5). E-mails with co-counsel re: notice of ex parte to opposing counsel (0.3). E-mails with co-counsel re: motion for add'l depositions (0.2). Reviewing draft motion for add'l depositions (0.3).
5/10/2011	Kevin Bayley	7.00	Other/Miscellaneous	Meeting with Melinda Bird re: concerns re: site inspection ex parte application (0.2). Meetings with Melinda Bird re: physician-patient privilege (0.1, 0.2). Meeting with Matthew Fishler re: same (0.3). Meeting with Autumn Elliott re: same (0.3). Meeting with Rachel Scherer re: upcoming depositions (0.2). E-mail to Ella Hushagen re: upcoming depositions (0.1). E-mails with co-counsel re: ex parte application re: site inspection (0.9). Call with PT re: availability (0.2). Legal research re: physician-patient privilege (1.7). Call with Jessica Price re: physician-patient privilege/call with Dr. Hill (0.3). Reviewing/revising drafts of ex parte application re: site inspection (1.2). E-mails with co-counsel re: D's response to TRO application (0.5). Reviewing D's TRO response (0.8).
5/11/2011	Kevin Bayley	6.70	Other/Miscellaneous	Call with co-counsel re: new filing for TRO, discovery issues (0.5). E-mails setting up call (0.2). Meeting with Ella Hushagen re: depositions today (0.1). Meeting with Ella Hushagen re: Defendant's no-shows at the deposition (0.1). Meeting with Ella Hushagen re: results of Falls prevention research (0.1). Meeting with Rachel Scherer re: depo schedule (0.2). E-mails with Dr. Hill/Jessica Price re: doctor depositions call (0.2). Research into cases cited by D's in opposition to TRO (1.4). Reading/Editing reply to TRO (0.4). Prepping for deposition of Nina Zaborin: research into her credentials, methods (1.3). Reading D's opposition to ex parte app for site inspection (0.3). Drafting waiver of physician-patient privilege (0.3). Meetings with Autumn Elliott re: waiver language (0.1/0.1). Editing waiver (0.2). Travel to/from jail to meet with Joe Gonzalez to have him sign waiver (0.5). Meeting with Joe Gonzalez re: waiver, current status at jail (0.7).

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5/12/2011	Kevin Bayley	5.20	Other/Miscellaneous	Reviewing materials to prep for meet and confer on discovery issues (0.7). Travel to meet and confer (0.6). Travel from meet and confer (0.4). Meet and confer re: discovery issues (1.5). Discussing issues before and after meet and confer with co-counsel Matthew Strugar (0.4). Review draft depo outline by J. Price for Dr. Theophilov depo (0.3). Meeting with Rachel Scherer re: visit to jail for White signature (0.2). Reviewing, scanning Gonzalez waiver doc, sending to J. Price for possible use during depo (0.2). Reviewing order re: TRO (0.2). Reviewing e-mails b/w co-counsel re: TRO order (0.2). E-mails with co-counsel re: postponement of doctor depositions (0.2). Call with Jessica Price re: postponement of doctor depositions, other discovery issues (0.1). E-mails re: handling intakes that might fall under Johnson (0.2).
5/13/2011	Kevin Bayley	5.20	Other/Miscellaneous	Call to Dr. Hill re: talking re: QA (0.1). Calls with Matthew Strugar re: discovery issues (0.1/0.2). Review of re: QA document needs (1.8). Legal research re: discovery request severability, discovery disputes (1.4). Meeting with Rachel Scherer re: her meeting with Derrick White (.4) re: complaint filed (0.1). E-mails with Ella Hushagen re: cancellation of depositions (0.4). Drafting memo re: questions for Dr. Hill on QA needs (0.4). E-mails with Matthew Strugar re: plaintiff depo transcripts (0.3).
5/14/2011	Kevin Bayley	0.80	Other/Miscellaneous	Call with Dr. Hill (0.5) re: what QA reports are typically kept by hospitals. Typing up notes from call (0.3).
5/15/2011	Kevin Bayley	0.40	Other/Miscellaneous	Reviewing e-mail sent by Melinda Bird re: TRO denial.
5/16/2011	Kevin Bayley	6.10	Other/Miscellaneous	Reading Merrick Bobb reports re: medical care (2.4). E-mails with co-counsel re: case issues, status (0.5). Review of Kwan depo re: QA procedures, etc. (0.7). Drafting notes re: our request for QA (0.6). Meeting with Ella Hushagen re: new project on medical records (0.2). E-mails with Rachel Scherer re: Theophilov questions (0.2). E-mails with Jessica Price re: next visit to Corcoran (0.2). Reviewing mail with transcripts from plaintiff depositions (0.1) Call with co-counsel re: TRO denial, discovery issues (1.2).

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5/17/2011	Kevin Bayley	3.60	Other/Miscellaneous	Call with Matthew Strugar re: drafting of meet and confer letter re: site inspections (0.1). E-mails with co-counsel re: discovery disputes with Defendant (0.4). Reviewing D's objections to site inspection (0.2). Reviewing Joe Gonzalez medical records from Kaiser (0.5). Reading AHRQ report re: quality of care standards for people with disabilities (1.3). Researching expert on pressure sores referenced in report/reading on preventing pressure sores (1.1).
5/18/2011	Kevin Bayley	5.20	Other/Miscellaneous	Call with Matthew Strugar re: discussion with opposing counsel re: discovery issues stipulation (0.1). Call with opposing counsel re: discovery issues stipulation (0.5). Discussion with Matthew Strugar re: call, other discovery issues (0.2). Typing up notes from call to send to co-counsel (0.4). Reviewing depo transcripts from Gonzalez/Grigsby depositions (3.2). E-mails with co-counsel re: Derrick White being put in hole, possible responses (0.4). Reviewing draft Meet and confer letter re: site inspection from Matthew Strugar (0.2). Reading Ella Hushagen review of Gonzalez records (0.2).
5/19/2011	Kevin Bayley	3.70	Other/Miscellaneous	Reviewing/revising findings of fact (0.8). Drafting e-mails re: quality of care measures (0.5). Reviewing drafts of M&C letter on site inspection (0.4), attempting to re-draft for maximum expert impact (0.5). E-mails with Jessica Price re: possible visit to Corcoran to go over transcripts with plaintiffs there (0.3). E-mails with Matthew Strugar re: protocol for going over plaintiff transcripts (0.3). E-mails with co-counsel re: scheduling new meeting re: TRO-related issues (0.2). Meeting with Rachel Scherer re: meetings with White/Ortiz (0.3). Reading Rachel's notes re: meetings (0.3). Reading Jessica's notes re: meeting with Bobby Perez (0.1).

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5/20/2011	Kevin Bayley	4.20	Other/Miscellaneous	Meeting with Rachel and Melinda re: responding to White complaints (0.7). Meeting with Rachel re: DOJ complaint form (0.2). Meeting with Melinda re: progress on the case (0.4). Locating, scanning, sending Curfman signature page to Matthew Strugar (0.3). E-mails re: meeting on Monday (0.3). Reviewing Chart re: proof (0.4). Review of Ella Hushagen reports on medical records (0.8). Reading Peter Johnson's case re: Ochoa charge (0.4). Reading CDCR regulations re: medical care (0.4). Review of discovery requests and responses re: declass issues and medical assessments (0.3).
5/23/2011	Kevin Bayley	6.60	Other/Miscellaneous	Travel to meeting at Winston with co-counsel (0.8). Meeting with co-counsel re: developments after TRO, discovery disputes, how to handle individual clients (1.9). Calls from/to Jessica Price re: depo transcripts changes (0.3). Reviewing medical records sections of Gonzalez and Grigsby plaintiff depositions (0.5). Reviewing invoice from expert Terry Hill (0.1). Reading Plata/Coleman Supreme Court decision (1.9). Reading reaction to Plata/Coleman (0.6). Reading re: exhaustion of administrative remedies (0.6).
5/24/2011	Kevin Bayley	0.80	Other/Miscellaneous	Reviewing notes from previous day's meeting (0.2). E-mails to/from Matthew Strugar re: stip progress from opposing counsel (0.2). Review of information re: preventive medicine in jails/prisons (0.4).
5/25/2011	Kevin Bayley	5.10	Other/Miscellaneous	Meeting with Ella Hushagen re: Carlos Ortiz records (0.1), re: TRO results, new assignment (0.3). Meeting with Melinda Bird/Ella Hushagen re: PT's/research on variance of disabilities (0.2). Meeting with Rachel Scherer re: her AM visit to jail (0.2). E-mails with Rachel Scherer re: AM visit to jail (0.2). Drafting document: our current litigation goals/demands (1.7). Reviewing 2008 settlement documents (0.5). Reviewing 2009 settlement document (0.4). E-mails and attempting to review correspondence from Jessica Price re: visit to Corcoran (0.3). Review of Ella Hushagen's reports on Ortiz/Johnson records (0.4). Review of notes for Carlos Ortiz criminal defense attorney name (0.8). E-mails with Rachel Scherer re: Carlos Ortiz criminal defense attorney name (0.3).

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5/26/2011	Kevin Bayley	6.10	Other/Miscellaneous	Meeting with Melinda Bird re: case coverage (0.2). Meeting with Rachel Scherer re: meeting with Carlos Ortiz' criminal atty, PT's (0.2). Meeting with Rachel Scherer re: visit tomorrow with clients at MCJ (0.3). Reviewing/editing joint stipulation re: discovery issues (1.2). Phone call with Matthew Strugar re: discovery stipulation (0.3). E-mails with Matthew Strugar re: changes to language in stipulation (1.1). Review of Baca v. Arpaio materials (0.4). Review of news articles re: MCJ conditions (0.8). E-mails/review of letter by Jessica Price re: visit to Curfman/Grigsby (0.4). Call to Jessica Price re: meeting with Derrick White (0.1). E-mail to Rachel Scherer re: P.T.'s name and contact information (0.1). Review of website with PT's bio (0.1). Review of draft letter by Rachel Scherer to Paul Beach re: Derrick White complaints (0.2). Prep documents for visit to clients at jail (0.5). Review of MS edits to stipulation (0.2). Call with Jessica Price re; review of White transcript (0.2).
5/27/2011	Kevin Bayley	4.80	Other/Miscellaneous	Travel to meet with Jessica Price to get depo transcript for verification (0.4). Travel to/from jail (0.7, above normal commute). At Jail: meeting with Carlos Ortiz (0.4); meeting with Derrick White (0.7); waiting for Joe Gonzalez, who was not brought down because of incident on unit (0.5). Phone call with Matthew Strugar re: changes to joint discovery stip (0.2). Reviewing edits/concerns by co-counsel and responding by e-mail to concerns to joint discovery stip (0.9). E-mails between co-counsel re: letter from Paul Beach on mediation, reading letter (0.6). Reviewing courts new order postponing mtc discovery hearing date (0.1). E-mails/phone calls with Jessica Price re: verification of White depo transcript (0.3).
5/29/2011	Kevin Bayley	1.90	Other/Miscellaneous	Review of Derrick White depo transcript (0.8). Review of Andre Butler depo transcript (1.1).

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5/31/2011	Kevin Bayley	4.20	Other/Miscellaneous	Drafting memo re: types of LASD medical records needed (1.4). Reviewing different medical records received (0.5). E-mails with co-counsel re: medical record reviews, scheduling, etc. (0.7). E-mails with co-counsel re: deposition transcript signatures (0.4). Discussions with co-counsel re: progress on joint discovery stipulation (0.3). Meeting with Melinda Bird re: negotiating dates of mediation with opposing counsel (0.2). Meeting with Rachel Scherer re: 5/27 meetings with Ortiz/White at jail (0.3). E-mails with co-counsel re: mediation timing and other mediation issues (0.4).
6/1/2011	Kevin Bayley	3.80	Other/Miscellaneous	Drafting litigation goals memos (1.8). E-mails with opposing counsel re: meeting to discuss discovery issues/record review (0.3). E-mails with co-counsel re: timing of mediation (0.4). E-mails, phone call with mediator's office re: availability for conference call (0.2). E-mails with Melinda Bird re: availability for conference call with mediator (0.2). Phone call with Rachel Scherer re: record review (0.1). Phone calls with Jessica Price re: depo transcript signings (0.2)/White depo (0.2). E-mails with co-counsel re: record review/discovery issues (0.4).
6/2/2011	Kevin Bayley	6.80	Other/Miscellaneous	Phone calls with Rachel Scherer re: declaration review (0.1/.1). Reviewing medical records at opposing counsel's office (4.8). Travel to/from opposing counsel's office to review medical records (above normal commute)(1.2). E-mail with co-counsel re: QA aspects of discovery fight (0.2). E-mails with co-counsel, review of letter from Paul Beach to Rachel Scherer and draft letter replying re: Derrick White complaints to jail (0.4).

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6/3/2011	Kevin Bayley	6.20	Other/Miscellaneous	Phone calls with Dr. Hill re: QA reports, etc. likely to be present at LASD facilities (0.3/0.3). Review of notes from earlier calls with Dr. Hill (0.2). E-mails with colleagues re: QA portion of discovery dispute (0.6). Phone call with Matthew Strugar re: QA issues (0.2). Drafting language to send to opposing counsel re: QA issue (0.8). E-mailing opposing counsel (0.2). Phone call with Jessica Price re: White depo transcript (0.2). Dropping off White depo transcript (0.3). Travel to jail to meet with Joe Gonzalez (above normal commute:0.3). Entering jail, organizing paperwork (0.3). E-mails with co-counsel re: organizing copy service (0.4). Discussion with office manager re: our copy service procedures (0.2). Phone call/e-mails with Rachel Scherer re: medical exams (0.3). Research re: Title 15 procedures for medical exam (0.5). Research re: federal rules, inspections (0.4). Meeting with Rachel re: letters with Beach, possible responses, issues regarding Derrick White (0.4). Reviewing J. Price edits to litigation goals documents (0.3).
6/6/2011	Kevin Bayley	1.10	Other/Miscellaneous	Weekly call with co-counsel (0.6). Call with Rachel Scherer re: visit to jail to meet with clients (0.2). Voicemail from and voicemail to D's attorney Justin Clark re: discovery stipulation issues (0.1). E-mails with paralegal re: contacting prisons, copy service, etc. (0.2).

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6/7/2011	Kevin Bayley	3.00	Other/Miscellaneous	Meeting with Rachel Scherer re: her meetings with clients later in the day (0.2). Call with Rachel Scherer re: results of meetings (0.1). E-mail from opposing counsel re: availability for call re: discovery stipulation (0.1). Voicemail to opposing counsel (0.1). Call with Matthew Strugar re: discovery issue (0.1). E-mails with Matthew Strugar re: copy service, other outstanding issues (0.2). Reviewing correspondence between Matthew Strugar and opposing counsel re: discovery matters, trial dates (0.3). E-mails with Ben Gipson and Matthew Strugar re: defendant's lack of transition plan (0.3). Reviewing E-mails with Judge Tevrizian's case manager re: scheduling medication (0.2). E-mailing same to co-counsel (0.1). Discussions with paralegal re: our needs for medical exams of guys in prison, details of requirements (0.3). Drafting letter to Columbus Grigsby re: depo transcript (0.4). Reviewing CDCR response to Coleman decision (0.4). Reviewing news story re: LA reaction to CDCR response (0.2).
6/8/2011	Kevin Bayley	0.50	Other/Miscellaneous	Review joint stipulation drafts from Justin Clark (0.2). E-mails with paralegal re: letter to client (0.1). E-mails with colleagues re: stipulation drafts (0.2).
6/9/2011	Kevin Bayley	0.30	Other/Miscellaneous	E-mails with colleagues re: setting up meeting to discuss settlement requests (0.2). E-mails with paralegal re: copy service for records (0.1).
6/13/2011	Kevin Bayley	0.30	Other/Miscellaneous	Weekly status call with co-counsel.
6/14/2011	Kevin Bayley	0.30	Other/Miscellaneous	Reviewing/writing e-mails with co-counsel re: meeting later this week.

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6/16/2011	Kevin Bayley	3.70	Other/Miscellaneous	Meeting with Melinda Bird re: upcoming co-counsel meeting prep (0.1). Meeting with Rachel Scherer re: correspondence from Carlos Ortiz (0.1). Discussing letter to Paul Beach re: Derrick White with Rachel Scherer (0.1/0.1). Review of letter drafts (0.6). Legal research: reading DLC self-critical analysis privilege case (0.5); reading case re: exhaustion of administrative remedies under PLRA (0.5). E-mail from opposing counsel re: schedule of upcoming depositions (0.1). E-mail from Matthew Strugar to co-counsel re: same (0.1). Call with Matthew Strugar re: contact with opposing counsel (0.1). E-mail to Matthew Strugar re: transition of case documents (0.2). Prep for 6/17 meeting by Reviewing settlement demands drafted previously (0.2). Review of correspondence from absence (0.2). E-mail to paralegal re: arranging for copying of records (0.1). Reading memo from Ella Hushagen re: review of Andre Butler records (0.1). E-mail with Ella Hushagen re: upcoming tasks (0.1). Review of orders from court on recently filed joint stipulations (0.1). Review of letters from potential class members (0.4).
6/17/2011	Kevin Bayley	4.90	Other/Miscellaneous	Drafting agenda for today's meeting (0.3). Travel to/from meeting at DRLC (0.7). Attending meeting with co-counsel at DRLC re: upcoming settlement discussions (2.2). E-mails with Matthew Strugar re: work transition (0.6). Reviewing draft Protective orders, dismissal of Peterson, correspondence with opposing counsel from Matthew Strugar (0.5). Review of draft 30(b)(6) depo outline from Matthew Strugar (0.6).
6/20/2011	Kevin Bayley	4.10	Other/Miscellaneous	Call with Justin Clark re: depo schedule (0.1). Weekly conference call with co-counsel (0.5). Review of Dukes v. Wal-Mart case and analysis re: class action suits (1.5). E-mails with Matthew Strugar re: case transition (0.3). Discussions with paralegal re: medical records to be copied (0.3). Review of letters re: depo transcripts (0.2). E-mails re: court transcript from hearing on class certification (0.2). Review of J. Price depo outline for Theophilov (0.3). E-mail to co-counsel re: depo scheduling (0.1). Review of legal/news articles re: solitary (0.6).

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6/21/2011	Kevin Bayley	0.10	Other/Miscellaneous	Voicemail from paralegal re: copy service question on Shawn Meyers files.
6/22/2011	Kevin Bayley	5.40	Other/Miscellaneous	Research re: general issues in deposing doctors (1.5). Research re: HIPPA factors in deposing doctors (1.3). E-mails with Ella Hushagen re: further research on HIPPA (0.3). Reading record review documents by Ella Hushagen (0.7). E-mails to Jessica Price re: doctor depositions (0.3). Drafting thoughts on questions for Zasorin deposition (1.2). Review of Zasorin declaration re: TRO (0.4).
6/23/2011	Kevin Bayley	0.30	Other/Miscellaneous	E-mail from Justin Clark re: deposition schedule (0.1). E-mails with Jessica Price re: deposition schedule (0.2).
6/24/2011	Kevin Bayley	4.10	Other/Miscellaneous	Meeting with Melinda Bird re: scheduling of depositions (0.3). E-mails with opposing counsel re: scheduling of depositions (0.3). E-mails with Jessica Price re: Scheduling of depositions (0.2), prep for depositions (0.4). Review of draft deposition outline by J. Price for Theophilov deposition (0.4). Editing Zasorin deposition outline (1.5). Discussions with Ella Hushagen re: HIPPA research (0.3), e-mails with EH re: same (0.2). Discussion with Ella Hushagen re: review of new records (0.1). Review of CD containing newly scanned records (0.3). Review of new notes by Ella Hushagen on Andre Butler records (0.2).

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6/27/2011	Kevin Bayley	6.00	Other/Miscellaneous	Call with co-counsel re: new discovery responses (0.1), prep for depositions this week (0.4), new client Mr. Cleveland (0.2). Call with Jessica Price re: deposition schedule (0.1). Voicemail from (0.1) and to (0.1) Justin Clark re: moving depositions from 6/28 to 6/29. E-mails with Justin Clark re: same (0.2). E-mails with Justin Clark re: moving 6/30 depositions (0.3). E-mails with co-counsel re: depo scheduling (0.3). Putting together records for Derrick White's criminal attorney (0.3); e-mailing records to attorney (0.2). Prep for deposition of Dr. Zasorin (2.6). Review new discovery responses (0.4). Review letter from possible new client (0.2). Discussions re: depo preparation/logistics with paralegal (0.1/0.2). Discussion with Ella Hushagen re: deposition preparation (0.2). Meeting with Melinda Bird re: providing Derrick White records to criminal attorney (0.1).
6/28/2011	Kevin Bayley	5.20	Other/Miscellaneous	Editing outline for Zasorin depo (2.9). Reviewing documents for Zasorin depo (0.4). Gathering supporting documents for Zasorin depo (0.5). Speaking with paralegal re: exhibits for Zasorin (0.2) and Theophilov depositions (0.2). Phone call (0.1) and e-mails (0.2) with Jessica Price re: exhibits for Theophilov depo. E-mails with Jessica Price re: possible HIPAA objection (0.4). Reviewing Larry Cleveland draft declaration (0.3).
6/29/2011	Kevin Bayley	8.60	Other/Miscellaneous	Drafting questions for Theophilov depo (0.5). Prepping for Zasorin depo (0.4). Attending Theophilov depo (6.4). Deposition of Zasorin (1.0). E-mails (0.2), phone call (0.1) cancelling court reporter for tomorrow.
6/30/2011	Kevin Bayley	3.90	Other/Miscellaneous	Reviewing discovery responses received earlier this week (1.7). Reviewing Fender/Kwan depo transcripts re: Armstrong (0.6). E-mailing with RBG re: Armstrong (.5). Reviewing rough draft transcript of Zasorin depo (0.4). Discussing new assignments with Ella (0.2). Discussing discovery organization with paralegal (0.2). E-mails with co-counsel prepping for mediation judge conference call (0.3).

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7/1/2011	Kevin Bayley	4.80	Other/Miscellaneous	Meetings with Melinda Bird re: dispositive motions, discovery obtained (0.6/0.3); re: new client who is quadriplegic (0.1); re: use of experts in summary judgment proceedings (0.2). Meeting with Ella Hushagen re: new work assignment on ADA/injunctive relief (0.3). Discussing discovery organization with paralegal (0.3). Review of discovery responses (1.2). E-mails with Armstrong class counsel re: ADA issues at LASD (0.4). E-mails with co-counsel re: current litigation tasks (0.1), deposition summarizations (0.2), payment of expert (0.1), new client who is quadriplegic (0.4). Call with Jessica Price re: meeting with Larry Cleveland, call to opposing counsel re: new client Trujillo (0.2). E-mail to Justin Clark re: ADA complaints/Armstrong documents (0.2). Organizing discovery documents (0.2).
7/5/2011	Kevin Bayley	4.90	Other/Miscellaneous	Drafting agenda for call (0.3). Call with co-counsel re: Tevrizian conference call, dispositive motions and mediation brief staffing and parameters, new jail complaints (0.9). Cleaning up notes from call, sending to co-counsel (0.1). Reading complaints passed along from ACLU (0.5), looking up inmates in AJIS system (0.3), e-mails with Jessica Price re: meeting with inmates making complaints (0.3). E-mails with Jessica Price re: meeting with reporter re: case (0.3). Discussions with paralegal re: organizing new complaints (0.1/0.1). E-mails with Armstrong counsel re: ADA complaints, LASD documents re: Armstrong (0.3). Reviewing early briefing in Armstrong case (0.4). Reading 1st Circuit summary judgment medical case (0.4). E-mails from opposing counsel re: ADA complaints/Armstrong/depositions (0.2). E-mails to opposing counsel re: same (0.2). Call to opposing counsel re: depo scheduling (0.1). Meeting with Melinda Bird re: meeting with Armstrong counsel (0.1). Meeting with Ella Hushagen re: her research on comprehensive plans under the ADA (0.3).

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7/6/2011	Kevin Bayley	5.10	Other/Miscellaneous	Meeting with Melinda, Rachel, Ella re: researching/drafting of dispositive motion (1.7). E-mails with Winston co-counsel re: depo reviews (0.4). Meeting with Melinda re: depo summaries by Winston (0.1). Call to Blake Thompson re: Armstrong meeting (0.1). Drafting spreadsheet for topics for depo review (0.9). Review of Zasorin depo transcript (0.5). Review of summary judgment civil procedure (0.9). E-mails with paralegal re: inmate complaints (0.1). E-mails with Jessica Price re: meeting with Cleveland, other declarants (0.2). Meeting with Rachel Scherer re: recent case developments (0.2)
7/7/2011	Kevin Bayley	1.60	Other/Miscellaneous	E-mails with co-counsel re: call with Tevrizian (0.2), law clerks at MCJ (0.3). Meeting with Ella Hushagen re: chart of facts (0.2). Meeting with Rachel Scherer re: reviewing documents/generating list of facts (0.4). Review of notes from yesterday's meeting with Melinda/Rachel/Ella (0.2). E-mails with paralegal about case file management (0.3).
7/8/2011	Kevin Bayley	4.80	Other/Miscellaneous	Review of Armstrong cases to prep for meeting at RBG (1.4). Meeting with Melinda (0.3) and Rachel (0.3) re: meeting at RBG re: Armstrong. Meeting with Jessica Price/HOY reporter re: case (0.8). Travel to/from meeting (0.7). E-mails with co-counsel re: research for dispositive motions (0.6). Reviewing fact chart prepared by Ella Hushagen from declarations (0.3). Meeting with her re: same (0.2). Phone call/e-mails setting up RBG meeting for 7/12 (0.2).
7/12/2011	Kevin Bayley	1.20	Other/Miscellaneous	Meeting with Blake Thompson, Gay Grunfeld, Ernie Galvan re: Armstrong case remedial plan effects in CDCR facilities.
7/12/2011	Kevin Bayley	0.90	Other/Miscellaneous	Travel to/from meeting at Rosen, Bien and Galvan.

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7/13/2011	Kevin Bayley	3.10	Other/Miscellaneous	Review of notes from meeting with Rosen, Bien and Galvan (0.2). Call with MB, RS re: Tuesday meeting with Rosen, Bien and Galvan (0.7). Review of Matthew Strugar draft of questions for classification designee (0.4). Meeting with Rachel re: depo prep (0.2). Meeting with Ella re: depo prep (0.2) and transition plan research (0.1). E-mails with opposing counsel (0.4) and co-counsel re: schedule of depositions (0.1). Review of ADA complaints produced by defendants (0.3). Review of depo questions drafted by Ella Hushagen (0.3). Review of 30(b)(6) depo notice/topics (0.2).
7/14/2011	Kevin Bayley	5.70	Other/Miscellaneous	Drafting outline for 30(b)(6) classification depo (1.8). Phone calls with Rachel Scherer re: questions for 30(b)(6) classification depo (0.2/0.3). Reviewing draft questions by Rachel Scherer (0.2) and Ella Hushagen (0.2). E-mailing co-counsel re: ADA complaints (0.2), upcoming depo (0.1). Meeting with Melinda Bird re: upcoming depositions (0.1), schedule for summary judgment motion (0.2). E-mail to paralegal re: dates for motion (0.1). Call with Justin Clark re: upcoming depo schedule (0.1). Reviewing recent correspondence with Justin Clark to prepare for call (0.1). Reviewing recent discovery received, Bates 6527-6913 (0.6). Reviewing transcript from class cert motion hearing (0.2). Discussing document organization with paralegal (0.1). Legal research re: requirement for ADA plan of care (1.2). Discussing legal research re: ADA plans with Ella (0.2).
7/15/2011	Kevin Bayley	6.20	Other/Miscellaneous	Call from reporter's office re: depo logistics (0.1). Discussions of logistics with paralegal (0.1/0.1). Meeting with Melinda/Rachel re: depo prep (0.3). Meeting with Rachel re: depo prep (0.2). Reviewing regulations (0.9). Revising outline (2.8). Reviewing Rachel's notes (0.5). Reviewing documents put together by Matthew Strugar to prep for depo (0.7). Reviewing Kwan deposition transcript (0.2). E-mailing Armstrong counsel re: ADA complaints (0.3).
7/17/2011	Kevin Bayley	1.80	Other/Miscellaneous	Prep for deposition of Lt. Mike Connor: review ADA regulations (0.8). Review/edit draft outline (1.0).

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7/18/2011	Kevin Bayley	7.60	Other/Miscellaneous	Prep for deposition (1.4). Taking deposition of Lt. Mike Connor (2.5). De-brief on deposition with Melinda Bird (0.3). Drafting summary judgment motion section re: regs (0.3). Reviewing testimony/deposition Of Stephen Smith from Coleman/Plata (1.0). Status conference call (0.6). E-mails re: declaration training for clerks (0.2). Reviewing memos from Winston re: transition plan (0.2). Reviewing defendant's responses to requests for admission/interrogatories (1.1).
7/19/2011	Kevin Bayley	3.40	Other/Miscellaneous	Reviewing D's answers to interrogatories (0.6). Reviewing Matthew Strugar draft of depo outline re: PMK topics (0.3). E-mails with Jessica Price re: ADA complaints (0.2). Review of Winston memos re: ADA coordinator, transition plan (0.9). Drafting list of outstanding tasks (0.2). Reviewing declaration training documents (0.3). Reviewing D's responses to 4th request for production (0.9).
7/20/2011	Kevin Bayley	1.50	Other/Miscellaneous	Review of some Armstrong briefing provided by Rosen Bien & Galvan (1.4). Review declaration and letter from Terry Alexander (0.1).
7/21/2011	Kevin Bayley	3.70	Other/Miscellaneous	E-mails with Justin Clark re: stipulation on depositions and depo scheduling (0.4). Reviewing stipulation on deposition schedule (0.1). Phone call with Jessica Price re: help for prep with 30(b)(6) depositions (0.2). Review/edit of Matthew Strugar draft of outline on 30(b)(6) topics on transportation and physical modifications (1.3). E-mail to Ben Gipson and Jason Hamilton re: documents in extranet re: architectural barriers (0.2). Review of Moore's re: summary judgment (0.7). Research re: LASD public procedures (0.5). Review of ABT report on p/w/d in CDCR system (0.3).
7/22/2011	Kevin Bayley	1.00	Other/Miscellaneous	E-mails with Jason Hamilton re: discovery searches (0.2). E-mails with Jason Hamilton re: depo of Captain Cruz (0.2). Call with Melinda Bird re: depo schedule (0.1), dispositive motions (0.1), case staffing (0.1). Call with paralegal re: stipulation signature (0.1). E-mails with opposing counsel re: depo stipulation (0.1) and depo schedule (0.1).

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7/25/2011	Kevin Bayley	6.90	Other/Miscellaneous	Meet with Rachel Scherer re: upcoming depositions (0.3). Regular call with co-counsel (0.3). E-mail from Melinda Bird re: dispositive motion drafting (0.1). E-mails with ACLU co-counsel re: depo prep (0.3). review of materials re: transportation (1.8). Review of materials re: accessibility (1.9). Drafting of depo outline (2.2).
7/26/2011	Kevin Bayley	7.60	Other/Miscellaneous	Prep for changes to facilities 30(b)(6) depo (1.5). Changes to facilities 30(b)(6) depo (2.3). Prep for transportation 30(b)(6) depo (1.2). Transportation 30(b)(6) depo (1.9). Discussing upcoming depo schedule with opposing counsel (0.1). Reviewing depo outline for remainder of 30(b)(6) topics (0.5). Discussing Dalton depo transcript with paralegal (0.1).
7/27/2011	Kevin Bayley	5.20	Other/Miscellaneous	review of Moore's section on summary judgment (1.4). Review of inmate complaints passed along from Jessica Price (0.3). Review of previous depositions, 30(b)(6) notice to determine what topics are left (0.8). E-mails with opposing counsel re: depo schedule (0.3). E-mails with co-counsel re: depo schedule (0.2). review of federal and local rules, look for judge's standing order regarding summary judgment (0.6). review of letter re: theophilov changes to transcript (0.1). Sending Theophilov transcript to Jessica Price (0.1). Brief review of Dalton transcript to determine if she was designated as PMK for anything (0.1). Begin drafting of meet and confer letter to opposing counsel re: summary judgment (0.4). Meeting with Rachel Scherer re: upcoming depositions (0.2). Meeting with Ella Hushagen re: upcoming depositions, depositions which took place during her absence (0.2). Review of correspondence from JAMS re: upcoming mediation (0.1); discussing same with paralegal (0.1). Discussing court reporter for upcoming deposition with paralegal (0.1). E-mails with paralegal re: same (0.2).

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7/28/2011	Kevin Bayley	5.40	Other/Miscellaneous	Call with Rachel Scherer re: deposition scheduling (0.1). Meeting with Melinda Bird re: summary judgment motion (0.2). Review of Garcia and CALIF summary judgment motions and facts (2.4). Review of Gov. code section 11135 and associated regulations (0.6). Review of cases interpreting those statutes and regs (1.5). Search for/review of written discovery requests re: ADA coordinator (0.3). E-mail from (0.1) and to (0.2) opposing counsel re: scheduling of depositions.
7/29/2011	Kevin Bayley	6.60	Other/Miscellaneous	Meetings with Melinda Bird (0.4) and Melinda Bird and Ella Hushagen re: drafting of summary judgment motion (0.4). Drafting meet and confer letter to opposing counsel re: summary judgment motion (0.6). Editing following comments from MB (0.4). Legal research re: summary judgment and affirmative defenses (0.3). Sending draft to co-counsel for comment (0.1). E-mails with co-counsel (0.2) and E-mail to Mediation judge's staff re: change in date (0.1). E-mails with Jason Hamilton re: deposition summaries (0.3) and discovery index (0.2). E-mails with Jessica Price re: message from named plaintiff Peter Johnson (0.2). Reviewing MB notes from morning meeting (0.1). Sending notes from 7/25 call to MB (0.1). Drafting summary judgment brief (2.7). Review inmate complaint sent along by ACLU (0.1). Discussions with paralegal re: deposition logistics (court reporter/conference rooms) (0.2). Reviewing charts by Ella Hushagen of quotes from declarations for summary judgment motion (0.2).
7/31/2011	Kevin Bayley	0.10	Other/Miscellaneous	E-mails from/to Melinda Bird re: drafting of summary judgment motion.

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8/1/2011	Kevin Bayley	3.70	Other/Miscellaneous	Call with Melinda Bird/Rachel Scherer re: summary judgment draft (0.2). Review of Melinda Bird draft of summary judgment motion (0.4). Call with co-counsel re: deposition schedule, Terry Alexander letter, meet and confer letter (0.2). E-mails with Shawna Parks re: meet and confer letter (0.2), re: summary judgment motion section on programming (0.1). Edits to meet and confer letter (0.3). Discussing meet and confer letter sending with support staff (0.3). Legal research on ADA regs pre: latest revision (0.4). E-mails with opposing counsel (0.2) and co-counsel (0.1) re: scheduling depositions. Call with Jessica Price re: deposition schedule (0.1). Discussion with Ella Hushagen re: next steps in research for summary judgment motion (0.1). Editing draft of summary judgment motion (0.5). Reviewing proof chart on case (0.3). reviewing Dalton depo transcript (0.3).
8/2/2011	Kevin Bayley	6.20	Other/Miscellaneous	E-mails with opposing counsel re: scheduling of depositions (0.2). E-mails with co-counsel re: scheduling/coverage of depositions (0.4). Meeting with Beverly re: logistics for depo (0.2). Review of Dalton summary from Winston, e-mail with Winston re: other things to review (0.2). E-mails with Armstrong counsel re: shared issues (0.3). Review of discovery to prepare for depo (2.2). Drafting depo outline (2.7).
8/3/2011	Kevin Bayley	6.60	Other/Miscellaneous	Prepare for deposition of deputy Greg Wright re: training of LASD personnel in dealing with inmates with disabilities (2.4). E-mails with Jessica Price re: further questions to ask (0.4). Deposition of Deputy Greg Wright (2.1). Discussing further depo scheduling/meet and confer scheduling with opposing counsel (0.2). Discussing deposition followup with Melinda (0.3). Meeting with Melinda/Rachel re: Summary Judgment motion tasks (0.3). Review of newly disclosed documents (0.2). Review of summary judgment latest draft from Melinda (0.3). Call with Jason Hamilton re: Captain Cruz depo (0.1). E-mails with co-counsel, support staff re: logistics for upcoming depositions (0.2). Review of correspondence from Judge Tevrizian's office (0.1).

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8/4/2011	Kevin Bayley	5.50	Other/Miscellaneous	Meeting with Melinda and Rachel re: summary judgment motion evidence, drafting (2.7). Reviewing discovery materials to prepare for summary judgment drafting (0.9). Editing summary judgment draft (1.2). E-mails with co-counsel re: depo summaries (0.2). Discussion with Molly Kort re: cite checking (0.3). Scanning documents provided by Justin Clark during 8/3 depo (0.1). Review of Michael Connor depo transcript materials (0.1).
8/7/2011	Kevin Bayley	2.60	Other/Miscellaneous	Review of Dr. Hill report for Summary Judgment drafting (1.2). Phone call with Rachel Scherer (0.3) and voicemails from/to Melinda Bird (0.2) re: summary judgment tasks. Drafting questions for upcoming depositions based on Hill report (0.9).
8/8/2011	Kevin Bayley	6.50	Other/Miscellaneous	Review/edit Jason Hamilton's outline for deposition of Captain Dan Cruz (2.9). Meeting with Melinda Bird, Rachel Scherer, paralegal re: summary judgment tasks (0.7). Call with co-counsel re: timing of summary judgment motion (0.5), drafting of mediation brief (0.3), discovery issues (0.2). Review of MB draft of summary judgment motion (0.3). Review of Winston memo on Govt. code 11135 to include in motion (0.2). Review of Summary judgment procedures (0.6). Discussing staffing for this week's depositions with Rachel Scherer (0.1) and Melinda Bird (0.1). Discussing transcripts ordering with paralegal (0.1) and e-mail to same re: same (0.1). E-mails with opposing counsel re: stipulation on depositions (0.1), meet and confer on summary judgment motions (0.1). Reviewing draft stipulation (0.1). E-mailing co-counsel re: deposition schedule, proposed stipulation (0.1). Review of LASD website history (0.2).

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8/9/2011	Kevin Bayley	7.70	Other/Miscellaneous	Meeting with Melinda Bird and Rachel Scherer re: prep for Burns deposition (2.1). Reviewing outline of Burns deposition by Melinda Bird (0.6). Review of Main, Brossoit, Kwan, Tavakoli depositions and document production to prep for Burns deposition (1.4). Legal research: marking a deposition, making an objection based on inappropriate privilege claim (0.4). Meeting with Melinda Bird, Rachel Scherer re: deposition of Captain Cruz (0.7). E-mails with opposing counsel (0.2) and co-counsel (0.2) re: moving Cruz deposition. Phone call with co-counsel re: availability for possible re-scheduled Captain Cruz deposition (0.1). Editing outline for Cruz deposition (1.3). Review of new complaints from inmates and e-mails with co-counsel re: same (0.3). Signing stipulation page (0.1). Speaking with paralegal re: her conversations with CSA, building dept. re: construction of jail facilities (0.2).
8/10/2011	Kevin Bayley	7.40	Other/Miscellaneous	Prepare exhibits for depositions of Chief Dennis Burns (0.6). Attend deposition of Chief Dennis Burns (3.1). Meet with opposing counsel re: schedule of other depositions and scheduling of meet and confer (0.1). Meet with Melinda Bird/Rachel Scherer to prepare for Captain Cruz deposition (0.6). Editing outline for Cruz deposition (2.6). Meeting with Melinda Bird re: staffing of upcoming depositions/meet and confer (0.2). E-mails with opposing counsel re: deposition/meet and confer schedule (0.1). Call to court reporter re: no depo for tomorrow (0.1).

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8/11/2011	Kevin Bayley	5.40	Other/Miscellaneous	Prep for meet and confer with Justin Clark re: summary judgment motion (0.4). Voicemail to Justin Clark re: meet and confer (0.1). Meet and confer with Justin Clark re: summary judgment motions (0.6). Meeting with Rachel Scherer re: meet and confer (0.1) and Zasorin deposition (0.3). E-mails with co-counsel (0.2) and opposing counsel (0.1) re: deposition schedule. E-mail to co-counsel re: meet and confer (0.3). E-mails with co-counsel re: strategy based on meet and confer (0.2). Reading article re: LASD K6G unit (2.9). Discussions with support staff re: depo logistics: getting draft of Burns transcript (0.2), getting reporters for upcoming depositions (0.1). E-mails with colleagues re: paralegal access to jail as paralegal on the case (0.2). E-mails with co-counsel re: LASD article on K6G (0.3). E-mails with co-counsel re: fees under ADA case (0.1). E-mail with Melinda Bird re: Burns deposition rough transcript (0.1).
8/12/2011	Kevin Bayley	0.20	Other/Miscellaneous	Meeting with Melinda Bird re: LA County documents re: transition plan.
8/12/2011	Kevin Bayley	5.30	Other/Miscellaneous	Drafting summary judgment brief (3.1). Voicemail to UCLA professor studying MCJ (0.1). Phone call with UCLA professor studying MCJ (0.6). Meeting with Melinda Bird, Rachel Scherer re: drafting of summary judgment brief (0.6). Review of written discovery requests received from defendants (0.2). E-mails with co-counsel re: taking new declarations from class members (0.2). Discussion with office manager re: paralegal taking declarations at jail (0.2). Discussion with paralegal re: procedures for taking declarations at jail (0.2). Review of complaints written by Peter Johnson during recent jail stay (0.1).

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8/15/2011	Kevin Bayley	4.80	Other/Miscellaneous	Voicemail from (0.1) and phone call to (0.2) opposing counsel re: cancellation of tomorrow's deposition due to illness of deponent, schedule for upcoming depositions. Review of Rachel's Zasorin outline (0.2). Meeting with Rachel re: Zasorin deposition prep (0.3). Meeting with Rachel re: cancellation of Zasorin deposition, using her research for other upcoming depositions (0.2). Phone call with co-counsel re: discovery update (0.3). Phone call with Jessica Price re: taking new declarations (0.3). Meeting with paralegal re: procedures for taking declarations (0.3). Reviewing/sending declaration training materials to paralegal/Jessica (0.2). Discussing potential declarants with paralegal (0.2). Discussing logistics for depositions with paralegal re: confirming reporter (0.1) then re: cancelling reporter (0.1). Reviewing complaints recently received to determine which to meet with (0.7). Review of County documents from OACC re: ADA transition plans (0.5). Reviewing discovery to prep for Cruz deposition (0.9). E-mails with co-counsel re: weekly call (0.2).
8/16/2011	Kevin Bayley	1.20	Other/Miscellaneous	E-mail from opposing counsel re: scheduling Smith deposition (0.1). E-mail to opposing counsel re: same (0.1). E-mails with co-counsel re: jail visit (0.2). E-mails (0.2) and discussion (0.2) with paralegal re: her trip to jail today to take declarations. Confirming deposition for tomorrow with court reporter (0.1). Review of MB notes on Cruz deposition outline (0.1). Review of notes made on questions for Burns, Cruz, Smith (0.2).
8/17/2011	Kevin Bayley	6.40	Other/Miscellaneous	Prep for deposition of Captain Dan Cruz (2.8). Deposition of Dan Cruz (3.3). Review of draft depositions in case (0.3).

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8/18/2011	Kevin Bayley	2.30	Other/Miscellaneous	Review of Armstrong materials received from Rosen, Bien & Galvan for overlap with our case (0.5). Meeting with Rachel Scherer re: Cruz depo (0.1) and outstanding legal research (0.2). Review of current task list (0.1). E-mails with opposing counsel re: upcoming deposition schedule (0.1). E-mails with co-counsel re: upcoming deposition schedule (0.1). Review of notes from plaintiffs depositions to prep for Smith deposition (0.2). Review of materials filed with original complaint (0.8). Review of correspondence, new witnesses designated by opposing counsel (0.2).
8/19/2011	Kevin Bayley	0.50	Other/Miscellaneous	Call to Shawna Parks re: mediation briefing schedule (0.1). E-mail to co-counsel re: mediation briefing schedule (0.1). E-mails with paralegal re: deposition transcripts, other discovery materials (0.3).
8/20/2011	Kevin Bayley	0.70	Other/Miscellaneous	Review of Shawna Parks draft of mediation brief (0.4). E-mail to co-counsel re: changes to brief (0.3).
8/22/2011	Kevin Bayley	5.40	Other/Miscellaneous	Call with co-counsel re: mediation brief and discovery updates (0.3). Review of OIR reports for disability references (1.4). review of Merrick Bobb reports for disability references (0.8). Legal research on applicability of 2010 regulations, older regulations and 2004 ADAAG standards (2.1). Review of CDCR Receivers report re: aging of prison population (0.4). Review of news articles re: LASD investigations into Lancaster Valley situation, Mitrice Richardson situation (0.4).
8/23/2011	Kevin Bayley	4.60	Other/Miscellaneous	Research on construction date of Twin Towers (0.3). Research on construction date of Men's Central Jail (0.2). Research on programming at jails (0.2). Review of draft briefs (0.6). Review of e-mails from co-counsel with comments re: draft briefs (0.3). Review of Dennis Burns depo transcript re: ADA compliance (0.3). Editing draft mediation brief (2.7).
8/24/2011	Kevin Bayley	6.00	Other/Miscellaneous	Red-line edits to mediation brief (0.9). E-mails with co-counsel re: brief (0.3). reading new declarations (0.4). Editing Summary Judgment motion (1.5). Legal research on DOJ settlements with ADA coordinator (1.0). Legal research on ADA/504 regs being invalidated (1.9).

8/25/2011	Kevin Bayley	6.20	Other/Miscellaneous	Meeting with Melinda Bird re: case developments (0.7). Meeting with Melinda Bird re: Cruz deposition (0.2). Meeting with Rachel Scherer re: upcoming schedule of discovery/briefing (0.2). E-mail from opposing counsel re: stipulation, reviewing draft stipulation (0.2). Drafting e-mail to opposing counsel re: deposition stipulation (0.2). Drafting e-mail to opposing counsel re: documents identified during Captain Cruz's deposition (0.2). Meeting with Autumn Elliott re: documents e-mail (0.2). Editing summary judgment motion (1.1). Preparing for deposition of Captain Smith (3.2).
8/26/2011	Kevin Bayley	5.30	Other/Miscellaneous	Prep for Captain Smith deposition, including review of Main, Brossoit, Connor depo transcripts, notes from Cruz depo, drafting outline (3.8). E-mails with Melinda Bird re: deposition schedule (0.3). E-mail from opposing counsel re: deposition schedule stipulation (0.1). Drafting e-mail to opposing counsel re: same (0.2). E-mail from opposing counsel re: newly identified documents (0.1). Phone calls (0.2/0.1) with Jessica Price re: goals for Deputy Bleau deposition. E-mails with Jessica Price re: new declarations (0.4). E-mail to co-counsel re: outline for Smith deposition (0.1).
8/27/2011	Kevin Bayley	0.80	Other/Miscellaneous	Reviewing draft outline for Steve Smith depo (0.4). E-mailing Melinda Bird and Rachel Scherer re: possible lines of questions for Smith deposition (0.4).
8/28/2011	Kevin Bayley	0.50	Other/Miscellaneous	Reviewing draft declarations (0.2). Sending notes to Jessica Price re: draft declarations (0.3).
8/29/2011	Kevin Bayley	9.20	Other/Miscellaneous	Phone call with Melinda Bird to prep for deposition of Steve Smith (0.2). Prep for deposition of Steve Smith (2.3). Deposition of Steve Smith (5.6). Review draft declarations (0.2). Sending notes to co-counsel re: draft declarations (0.1). Review draft outline for Deputy Bleau deposition (0.6). Sending notes to co-counsel re: draft outline (0.3).

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8/30/2011	Kevin Bayley	6.80	Other/Miscellaneous	Review/Prepare documents for Deputy Bleau deposition (0.6). Deposition of Deputy Bleau (3.2). Factual research re: disability prevalence summary judgment brief (0.4). Legal research re: ADA coordinators (0.3). Meeting with Melinda Bird re: deputy Bleau depo (0.2). Meeting with Rachel Scherer re: summary judgment progress (0.1). Call with Rachel Scherer re: medication as MH treatment (0.1). Drafting outline for complaint PMK deposition (1.9).
8/31/2011	Kevin Bayley	6.00	Other/Miscellaneous	Call with Melinda and Rachel re: summary judgment tasks (0.9). Review/editing of confidential portion of mediation brief (0.5). Sending comments on same to co-counsel (0.2). Editing of outline for complaint PMK deposition (2.3). Preparation of materials for deposition (0.8). Review of Kwan, deposition transcript to prep for deposition (0.2). Research on plan for new parolees coming to county (0.3). E-mails with co-counsel re: ADA regulation applicability (0.3). Research on LASD website ADA materials (0.2). Research on duty to update rule 26 disclosures (0.3)
9/1/2011	Kevin Bayley	5.10	Other/Miscellaneous	Prepare for deposition of Sgt. Jerome Ryan (0.8). Deposition of Sgt. Jerome Ryan (3.4). Meeting with Melinda Bird re: deposition of Jerome Ryan (0.2). E-mail to co-counsel re: deposition, newly produced documents (0.2). Phone call with Jessica Price re: possible new declaration (0.1) and deposition results (0.1). E-mail from Alexandra Zuiderweg re: stipulation to continue depositions (0.1). Reviewing/editing of stipulation (0.1). E-mail to Alexandra Zuiderweg re: edits (0.1).
9/2/2011	Kevin Bayley	2.10	Other/Miscellaneous	E-mail from Justin Clark re: deposition stipulation (0.1). E-mail from Justin Clark re: document production (0.1). Drafting e-mail to Justin Clark re: deposition stipulation (0.4). Discussing e-mail with Melinda Bird (0.2). Legal research re: unavailability of witness (1.1). Meeting with Rachel Scherer to discuss MSJ tasks (0.1). E-mail to co-counsel re: document production (0.1).

9/6/2011	Kevin Bayley	1.80	Other/Miscellaneous	E-mail from (0.1) and to (0.3) opposing counsel re: Dr. Zasorin's deposition. Meeting with Rachel Scherer re: research/briefing schedule (0.2). Legal research on duty to protect from harm (0.7). Review Rachel Scherer draft (0.1). E-mailing with Rachel/Melinda re: difficulties with formatting (0.2). E-mails with paralegal re: building permit progress (0.2).
9/7/2011	Kevin Bayley	2.80	Other/Miscellaneous	Drafting summary judgment motion uncontroverted facts (0.6). researching LASD website for facts (0.5). Editing MSJ (1.1). Meeting with Rachel re: medication research (0.1). Reviewing results of Rachel's research (0.1). Reviewing draft evidentiary objections by Winston attorneys (0.4).
9/8/2011	Kevin Bayley	1.60	Other/Miscellaneous	E-mails with opposing counsel re: stipulation on depositions (0.2). Reviewing draft stipulation (0.2). Meeting with Melinda Bird re: scheduling for Summary Judgment motion (0.3). Meeting with Melinda Bird re: structuring of uncontroverted facts section (0.1). Editing Summary judgment motion (0.7).
9/9/2011	Kevin Bayley	3.80	Other/Miscellaneous	E-mails with Jessica Price re: new declarations (0.2). Call with Rachel Scherer re: briefing schedule (0.2). E-mails with opposing counsel re: deposition schedule stipulation (0.2). Reviewing, signing, scanning stipulation (0.2). Legal research: duty to protect from harm (0.8). Legal research: Pierce case citations (0.4). Legal research: Editing summary judgment brief (1.8).
9/12/2011	Kevin Bayley	3.70	Other/Miscellaneous	Meeting with Melinda Bird re: summary judgment motion (0.1), mediation staffing (0.1). Call with co-counsel re: upcoming mediation, discovery issues (0.8). Editing Summary Judgment brief (2.4). Review of newly signed declarations (0.3).
9/13/2011	Kevin Bayley	1.50	Other/Miscellaneous	Editing Summary judgment motion.
9/13/2011	Kevin Bayley	3.10	Other/Miscellaneous	discussing with paralegal re: building permits (0.2). Discussing with Melinda (0.1). Edits to MSJ (2.8).
9/14/2011	Kevin Bayley	2.80	Other/Miscellaneous	Review of D's response to discovery responses (0.2). E-mail to co-counsel re: same (0.1). Editing Summary Judgment motion (1.9). Reviewing Defendants' mediation brief (0.4). Discussing case matters with support staff (0.2).

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9/15/2011	Kevin Bayley	1.10	Other/Miscellaneous	Drafting letter re: discovery responses (0.7). E-mail with co-counsel support staff re: letter (0.4).
9/16/2011	Kevin Bayley	3.50	Other/Miscellaneous	Reading letter from opposing counsel re: discovery responses (0.2). Reading e-mails from co-counsel re: response strategy (0.3). Drafting response (0.8). Discussing response with Rachel Scherer (0.2). Editing response (0.3). Discussing formatting, sending of letter with support (0.1/0.1). Discussing Summary Judgment motion tasks with Rachel (0.2/0.2). Discussing Summary Judgment motion drafting with Melinda (0.2). Editing uncontroverted facts (0.4). call with Jessica Price re: mediation prep (0.2). E-mail with same re: same (0.1). E-mail to paralegal re: tasks for summary judgment motion (0.2).
9/20/2011	Kevin Bayley	1.70	Other/Miscellaneous	E-mails (0.2) and phone call (0.3) with Melinda Bird re: latest draft of SJ brief. Meetings with paralegal re: organization of Summary Judgment brief and facts (0.3/0.1/0.2). E-mail from Rachel re: same (0.1). E-mail from opposing counsel re: discovery responses dispute (0.3). E-mailing same to co-counsel (0.2).
9/21/2011	Kevin Bayley	3.90	Other/Miscellaneous	Phone call with Steve Smerek re: prep for meet and confer with opposing counsel (0.7). Legal research on Nacht, Coito, related cases (1.4). Review of our their discovery requests/discovery responses (0.4). Meeting with Rachel Scherer re: state of SJ brief (0.2). E-mails with Jason Hamilton re: drafting of discovery responses (0.4). E-mails with co-counsel re: upcoming meet and confer (0.5). Review of Melinda Bird edits to uncontroverted facts (0.3).
9/22/2011	Kevin Bayley	3.10	Other/Miscellaneous	Meet and confer with opposing counsel re: discovery issues (0.8). Travel to/from meet and confer (1.1). Type up notes to prep for meet and confer (0.6). Review e-mails from co-counsel re: 9/23 meeting re: mediation (0.3). Review e-mails from co-counsel re: possible media interview (0.3).

9/23/2011	Kevin Bayley	5.30	Other/Miscellaneous	Travel to/from meeting at DRLC re: mediation prep (1.3). Meeting with co-counsel re: mediation prep (2.5). Reviewing correspondence from opposing counsel (0.1). Reviewing e-mails re: mediation exhibits (0.1). Discussing Mediation briefs with paralegal (0.1). E-mailing paralegal re: prepping materials for mediation. Meeting with Rachel re: progress on briefing (0.1). Reading Defendants mediation brief, reviewing their exhibits (1.1)
9/26/2011	Kevin Bayley	2.10	Other/Miscellaneous	E-mails with Jessica Price re: setting up class member media interviews (0.5). Phone call with Jessica Price re: lodestar calculation (0.1) and Peter Eliasberg's impressions of Judge Tevrizian (0.1). E-mails with co-counsel re: updating initial disclosures (0.3). Reviewing initial disclosures (0.2). E-mail to Melinda Bird re: mediation prep meeting of 9/23 (0.3). Review of Defendant's mediation brief sections on programming/complaints (0.4). E-mails with paralegal re: mediation prep (0.1) and lodestar calculation (0.1).
9/27/2011	Kevin Bayley	3.70	Other/Miscellaneous	E-mails with paralegal, colleagues re: attorney fees chart (0.2). Meeting with same re: same (0.1). E-mails with Shawna re: same (0.2). Reviewing chart (0.1). Discussing chart with Melinda (0.1). E-mailing Chart to Shawna (0.1). Call with Melinda re: mediation prep (0.3). Meeting with same re: same (0.3). Meeting with paralegal re: organizing materials for litigation (0.2). E-mails with Jessica Price re: 2011 declaration (0.2). E-mails (0.1) and meeting (0.1) with Rachel Scherer re: same. Review of mediation briefs, other mediation prep (1.7).
9/28/2011	Kevin Bayley	6.90	Other/Miscellaneous	Attending mediation session (6.1). Travel from mediation to office (0.4). Discussing mediation session with Melinda Bird, Rachel Scherer and paralegal (0.3). Discussing schedule of summary judgment brief, case deadlines with Melinda Bird, Autumn Elliott (0.1).
9/29/2011	Kevin Bayley	2.60	Other/Miscellaneous	Reviewing/typing up notes from mediation (1/6). Reviewing notes by J. Price of mediation (0.3). E-mails with J. Price re: media interview tomorrow (0.3). E-mails with support staff re: collect call, conference call tomorrow for interview (0.4).

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9/30/2011	Kevin Bayley	2.00	Other/Miscellaneous	Call with Jessica Price and Hoy reporter (0.6). Call with Jessica Price re: phone issues (0.2). E-mails with same re: same (0.3). Review of proposed protective order from opposing counsel re: complaint forms/policy (0.3). Review of ACLU jail information (0.6).
10/3/2011	Kevin Bayley	2.90	Other/Miscellaneous	Break out, Weekly Call with co-counsel (1.0), review of drafts of letter to opposing counsel re: mediation (0.8), comments on drafts (0.4), e-mails re: upcoming media contacts (0.7).
10/4/2011	Kevin Bayley	0.40	Other/Miscellaneous	Review of letter re: mediation (0.2). Meeting with paralegal re: timing of summary judgment brief (0.1). Call to, voicemail left for Dr. Hill re: current case status (0.1)
10/6/2011	Kevin Bayley	0.10	Other/Miscellaneous	0.1 review e-mail to Logan Hopper (expert)
10/7/2011	Kevin Bayley	1.10	Other/Miscellaneous	Reviewing/drafting supplemental responses 0.8. Johnson e-mails re: mediation followup 0.2. E-mail re: protective order (0.1).
10/12/2011	Kevin Bayley	0.80	Other/Miscellaneous	0.3 review of Ley information. 0.2 call with Jessica. 0.3 e-mails to Jessica re: upcoming media.
10/13/2011	Kevin Bayley	0.30	Other/Miscellaneous	E-mails with Jessica Price re: upcoming interview with LA Weekly reporter.
10/13/2011	Kevin Bayley	0.40	Other/Miscellaneous	Review of notes from mediation to prep for (0.1) and Call with Dr. Hill re: questions arising from mediation (0.3).
10/14/2011	Kevin Bayley	1.60	Other/Miscellaneous	Traveling to/from and attempts to arrange interview with declarant and LA Weekly reporter (1.6).
10/17/2011	Kevin Bayley	1.30	Other/Miscellaneous	Phone call with co-counsel re: case developments (0.4). Formatting notes from call, e-mailing to Melinda/Rachel (0.1). Reviewing discovery supplemental responses, sending to co-counsel (0.2). Phone call with Shawna Parks re: cost of fixes they've made (0.2). E-mailing information to same, re: same (0.1). Reading news articles re: LA jails (0.3).
10/24/2011	Kevin Bayley	0.90	Other/Miscellaneous	Call with co-counsel (0.2). E-mails re: discovery issues (0.1). Review of summary judgment prior draft (0.6).
10/25/2011	Kevin Bayley	0.50	Other/Miscellaneous	E-mails with Jessica Price re: other examples of jail/prison disability issues (0.3). Discussing same with Melinda (0.1). E-mailing with Rachel re: same (0.1).
10/26/2011	Kevin Bayley	0.20	Other/Miscellaneous	Meeting with Melinda re: recent case progress (0.2).
10/26/2011	Kevin Bayley	0.30	Other/Miscellaneous	E-mails with co-counsel re: discovery, review of draft stip (0.3).

10/28/2011	Kevin Bayley	2.00	Other/Miscellaneous	E-mail to co-counsel re: discovery supplements (0.3). Editing Summary judgment brief (1.7).
10/29/2011	Kevin Bayley	2.40	Other/Miscellaneous	Review of named plaintiffs' depositions to integrate into SJ motion.
10/29/2011	Kevin Bayley	2.80	Other/Miscellaneous	Drafting summary judgment motion sections.
10/31/2011	Kevin Bayley	0.40	Other/Miscellaneous	Phone call with Jason Hamilton re: discovery supplements (0.2). E-mails with co-counsel re: call scheduling (0.2).
11/1/2011	Kevin Bayley	0.50	Other/Miscellaneous	Drafting letter to named plaintiff Columbus Grigsby re: his recent conversation with Rachel Scherer.
11/4/2011	Kevin Bayley	0.80	Other/Miscellaneous	Calling in for weekly conference call (0.3). E-mails with Jason Hamilton re: supplemental disclosures (0.2). Reviewing supplemental disclosures (0.3).
11/7/2011	Kevin Bayley	0.70	Other/Miscellaneous	Weekly call with co-counsel.
11/7/2011	Kevin Bayley	0.20	Other/Miscellaneous	Drafting notes on weekly call, sending to Melinda, Rachel, paralegal.
11/9/2011	Kevin Bayley	0.40	Other/Miscellaneous	Reading HOY article (0.2). E-mail from co-counsel re: site visit (0.1). Phone call to Dr. Hill re: upcoming expert disclosure deadline (0.1).
11/10/2011	Kevin Bayley	0.20	Other/Miscellaneous	Meeting with Melinda re: SJ motion draft comments.
11/12/2011	Kevin Bayley	2.60	Other/Miscellaneous	Review of Andre Butler deposition transcript, declaration.
11/14/2011	Kevin Bayley	3.40	Other/Miscellaneous	Call with co-counsel re: case status (0.7). Prep for co-counsel call, note-taking on agenda (0.2). Speaking with Rachel S. re: involvement on case (0.1). Phone call to Dr. Hill re: expert disclosures (0.1). Speaking with Melinda Bird re: MSJ draft (0.1). Review of Andre Butler medical records (1.6). Drafting notes re: possible new report areas for expert (0.3). Meeting with Melinda Bird re: new report (0.1). Review of Areas for expert Logan hopper to examine in 11/16 visit to jail (0.2).
11/15/2011	Kevin Bayley	4.70	Other/Miscellaneous	Review of Jessica Price drafted supplemental discovery responses (0.4). Review of Jessica Price e-mail re: trustee duties (0.3). Review of deposition transcripts re: same (0.4). Review of medical records to draft supplemental discovery responses (3.4). E-mails with Jessica Price re: deposition transcripts (0.2).

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11/16/2011	Kevin Bayley	6.50	Other/Miscellaneous	Supplemental discovery - drafting 2.1 Reviewing records, depositions, etc. in order to draft discovery responses 3.7. Jessica Price calls re: same 0.2 Calls/e-mails with Rachel re: Columbus Grigsby visit to office .5
11/17/2011	Kevin Bayley	4.80	Other/Miscellaneous	Travel to/from meeting (0.4). Meeting with Shawna Parks, Logan Hopper re: Hopper's meeting with LASD expert (2.2). Review of depositions, documents re: cost of keeping individual in jail medical unit (0.4). E-mails with co-counsel re: new document production (0.3). E-mails with co-counsel re: defendant document production, deposition transcripts (0.5).
11/18/2011	Kevin Bayley	1.40	Other/Miscellaneous	Drafting Summary Judgment motion.
11/18/2011	Kevin Bayley	0.30	Other/Miscellaneous	E-mails with co-counsel re: universe of documents produced.
11/21/2011	Kevin Bayley	4.70	Other/Miscellaneous	E-mails with co-counsel re: deposition exhibits to provide to Logan Hopper (0.3). E-mail from Dr. Hill re: potential security expert (0.1). Call with potential security expert (0.3). Editing SJ motion (3.2). Weekly call with co-counsel (0.3). Review of memo from Logan Hopper re: 11/16 visit to jail (0.2). Review of DC class certification case (0.3).
11/22/2011	Kevin Bayley	4.10	Other/Miscellaneous	Review of medical record summaries (0.6) and medical records (2.9) of named plaintiffs and class members. Review of correspondence from opposing counsel re: deposition transcript changes (0.1). E-mail to co-counsel re: discussion with potential expert (0.2). E-mails with co-counsel re: meeting with expert (0.1). Drafting notes re: possible new expert report (0.2).
11/23/2011	Kevin Bayley	1.40	Other/Miscellaneous	call to Dr. Hill re: upcoming expert report - 0.1; medical record review re: inclusion in expert report (1.3);
11/28/2011	Kevin Bayley	7.00	Other/Miscellaneous	Call to Dr. Hill (0.1), e-mail to same (0.1), call with (0.2) re: upcoming expert report. Drafting sections of expert report (3.6). Review of medical records to aid in drafting expert report section (2.3). Weekly call with co-counsel re: case updates (0.7).

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11/29/2011	Kevin Bayley	4.80	Other/Miscellaneous	E-mails with co-counsel re: draft of expert report (0.4). Revising expert report (1.4). Call with expert re: revisions to report (0.3). Call with co-counsel re: report (0.1). Review of prior expert reports (0.7). E-mails with co-counsel re: extranet access for expert (0.6). Organizing medical records for expert (0.8). Sending medical records to expert (0.5).
11/30/2011	Kevin Bayley	4.00	Other/Miscellaneous	Call with expert re: report revisions (0.3). Call with co-counsel re: report revisions (0.2). Revising report (1.9). E-mails with co-counsel re: documents for service (0.3). E-mails with co-counsel re: Winston extranet (0.5). E-mails with Autumn re: new attorney to help with Johnson, her assignments (0.3). Review of Logan Hopper report (0.5).
12/2/2011	Kevin Bayley	1.30	Other/Miscellaneous	E-mails with Jessica Price re: drafting of SJ motion (0.2). Discussions with Autumn Elliott (e-mail and in person) re: task for attorney (0.3). Writing out tasks for attorney (0.4). Review of Supplemental discovery from Jessica Price re: Terry Alexander (0.2). Review of correspondence from mediator re: next scheduled session (0.2).
12/2/2011	Kevin Bayley	0.40	Other/Miscellaneous	Review of evidence templates provided by Autumn from other cases.
12/5/2011	Kevin Bayley	1.00	Other/Miscellaneous	Weekly call with co-counsel.
12/8/2011	Kevin Bayley	0.50	Other/Miscellaneous	Reviewing news article re: case.
12/9/2011	Kevin Bayley	3.50	Other/Miscellaneous	Editing Summary judgment motion (0.7). Research re: same, reviewing treatise, Armstrong briefing, pierce decisions (2.8).
12/12/2011	Kevin Bayley	1.40	Other/Miscellaneous	Weekly call with co-counsel (0.7). E-mails from co-counsel re: settlement scheduling (0.2), potential class members (0.3). Discussing deposition summaries with Joanne Kim (0.2).
12/13/2011	Kevin Bayley	3.80	Other/Miscellaneous	editing MSJ (2.8). Reviewing ADA regs (0.4). Reviewing e-mails re: settlement discussions (0.3). Review sample brief from Sean (0.3).
12/14/2011	Kevin Bayley	0.30	Other/Miscellaneous	Meeting with Joanne Kim re: questions in Burns depo re: "Medical units" (0.2). Reviewing e-mail from co-counsel re: expert reports (0.1).
12/15/2011	Kevin Bayley	1.60	Other/Miscellaneous	0.2 review of e-mails re: scheduling matters. Re-drafting summary judgment motion sections (1.4).

12/16/2011	Kevin Bayley	1.20	Other/Miscellaneous	Review of draft stipulations (0.2). Review of Burn deposition summary (0.2). Review of SUF/SJ drafts to create framework for putting documents together (0.8)
12/19/2011	Kevin Bayley	1.30	Other/Miscellaneous	Weekly call with co-counsel (0.3). review of, comments on stip changes (0.3). Discussing case with Melinda (0.1). Meeting with Joanne Kim re: next steps in citation gathering (0.3). Review of SUF draft (0.3).
12/20/2011	Kevin Bayley	0.40	Other/Miscellaneous	E-mails with co-counsel re: wording of joint stipulation on scheduling (0.2), re: supplemental discovery responses (0.2).
12/21/2011	Kevin Bayley	1.40	Other/Miscellaneous	Attempting to get on call re: supp discovery (0.3). E-mails re: stipulation issues (0.4). Discussing next steps of SJ with Joanne (0.2). Discussing SUF with paralegal (0.2). E-mails with colleagues re: evidence (0.3).
12/22/2011	Kevin Bayley	0.30	Other/Miscellaneous	Discussing drafting of statement of uncontroverted facts with paralegal.
1/5/2012	Kevin Bayley	0.30	Other/Miscellaneous	Review of e-mails, drafts re: joint stipulation.
1/9/2012	Kevin Bayley	0.40	Other/Miscellaneous	Weekly call with co-counsel.
1/10/2012	Kevin Bayley	0.40	Other/Miscellaneous	E-mail from Shawna re: update (0.1). Discussing new schedule of case with paralegal (0.1). Review of stip as filed (0.2).
1/11/2012	Kevin Bayley	2.50	Other/Miscellaneous	E-mails with co-counsel re: 1/12 settlement meeting (0.2). Review of mediation briefs (1.2). Review of Board of Supervisors/Sheriffs reports re: violence to see if class members mentioned (0.6). Review of news articles re: same (0.5).
1/12/2012	Kevin Bayley	3.90	Other/Miscellaneous	Prep for meeting at Defendant's counsel's office re: settlement by review of prior correspondence, mediation briefs (0.8). Meeting with Defendant's counsel's re: settlement discussions in advance of mediation (1.1). Meeting with Shawna Parks and Steve Smerek to discuss results of meeting (0.3). Travel from meeting to office (0.6). Review of Shawna Parks notes from meeting (0.2). Phone call to maker of merlexi chair (0.4). Internet research re: different wheelchairs for use in prison setting (0.5).

1/13/2012	Kevin Bayley	3.70	Other/Miscellaneous	Phone call with Shawna Parks re: mediation supplemental brief (0.4). Review of supplemental brief materials (0.8). E-mails re: same (0.3). Discussion with Melinda Bird of 1/12 settlement meeting (0.3). Review of new Armstrong order (1.1). E-mails re: supplemental brief, new order in Armstrong, etc. (0.8).
1/17/2012	Kevin Bayley	2.80	Other/Miscellaneous	Call with co-counsel re: supplemental brief (0.8). Edits to Supplemental brief, drafting language re: Armstrong (1.3). Review of Logan Hopper comments on supplemental brief (0.2). E-mails with Rachel Scherer (0.2) and Jason Hamilton (0.3) re: visit to Columbus Grigsby at jail.
1/18/2012	Kevin Bayley	2.30	Other/Miscellaneous	Call with Expert Terry Hill re: declass/complications tracking (0.4). E-mail to litigation team re: results of call (0.3). Reading complaint in new jail case (Rosas)(0.9). E-mail, declaration from Jessica Price (0.3). reviewing new Rehab act case and e-mails regarding effect (0.4).
1/19/2012	Kevin Bayley	1.00	Other/Miscellaneous	Review of defendants supplemental brief (0.4). E-mails re: Columbus Grigsby at Men's Central Jail (0.2). E-mails with co-counsel re: planning for mediation on Monday 1/23 (0.4).
1/20/2012	Kevin Bayley	4.00	Other/Miscellaneous	E-mails with co-counsel re: attendance at mediation (0.3). Call with Jessica Price re: attendance at mediation (0.2). Call with Jane Hermes re: merlexi wheelchair (0.5). Reviewing Merlexi wheelchair materials (0.3). Reviewing materials (briefs, correspondence, expert reports) to prep for mediation on 1/23 (2.7).
1/23/2012	Kevin Bayley	6.90	Other/Miscellaneous	Attending mediation session (5.6). Discussing mediation with Shawna Parks, Paula Pearlman and Logan Hopper (0.7). Travel from mediation to office (0.4). E-mails with co-counsel re: mediation session (0.2).
1/25/2012	Kevin Bayley	0.40	Other/Miscellaneous	Meeting with Melinda Bird re: settlement progress.
1/30/2012	Kevin Bayley	1.10	Other/Miscellaneous	Call with co-counsel re: follow-up from Mediation (0.9). E-mails with co-counsel re: scheduling next mediation session, notes from mediation (0.2).
1/31/2012	Kevin Bayley	0.20	Other/Miscellaneous	E-mails re: declaration gathering (0.1). Review of dates in signed order on stip continuing (0.1).
2/2/2012	Kevin Bayley	1.60	Other/Miscellaneous	Drafting settlement agreement.

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2/6/2012	Kevin Bayley	1.30	Other/Miscellaneous	Review of news articles re: prison population stats, makeup(1.2). Meeting with Rosa re: upcoming deadlines (0.1).
2/8/2012	Kevin Bayley	0.40	Other/Miscellaneous	E-mail to Justin re: meeting re: settlement agreement.
2/16/2012	Kevin Bayley	0.20	Other/Miscellaneous	E-mails with Shawna Parks re: Summary Judgment motion timing.
2/17/2012	Kevin Bayley	0.60	Other/Miscellaneous	Review draft of Summary judgment motion, outline areas to keep.
2/21/2012	Kevin Bayley	1.30	Other/Miscellaneous	E-mail to Justin re: settlement discussions (0.2). Call with Shawna re: settlement, upcoming deadlines (0.3). Voicemails, e-mails with Shawna re: same (0.2). E-mail to Johnson team re: draft settlement agreement (0.2). Call with Megan Hagler at Prison Law Office re: chairs (0.3). Meeting with Melinda re: upcoming Johnson deadlines (0.1).
2/28/2012	Kevin Bayley	0.30	Other/Miscellaneous	E-mail to Shawna re: Dr. Hill's rates (0.1); e-mail to Steve Smerek re: availability for mediation (0.1). Discussing with Melinda upcoming mediation date (0.1).
2/29/2012	Kevin Bayley	0.50	Other/Miscellaneous	E-mail to Justin Clark re: physical access analysis (0.2). Discussing next mediation session with Melinda (0.1). Discussing summary judgment motion with Melinda (0.1). Discussing scheduling of mediation with paralegal (0.1).
3/1/2012	Kevin Bayley	1.10	Other/Miscellaneous	Meeting with Melinda re: SJ motion drafting (0.4). Legal research on applicability of Pierce case (0.7).
3/2/2012	Kevin Bayley	5.00	Other/Miscellaneous	Meeting with Melinda, Rachel and Autumn re: summary judgment tasks (1.8). Review of summary judgment motion and undisputed facts (1.4). E-mails with colleagues re: summary judgment tasks (0.9). Phone call with Jessica Price re: summary judgment tasks (0.1). E-mails re: DRLC staffing change (0.2). E-mails with paralegal re: mediation date setting (0.1). Phone call/e-mail with Blake Thompson re: CRDF client (0.3). E-mail to co-counsel re: CRDF client (0.2).
3/3/2012	Kevin Bayley	3.80	Other/Miscellaneous	Drafting, checking citations for statement of uncontroverted facts for summary judgment motion.
3/4/2012	Kevin Bayley	4.70	Other/Miscellaneous	Drafting, checking citations for statement of uncontroverted facts for summary judgment motion.
3/5/2012	Kevin Bayley	6.40	Other/Miscellaneous	Editing summary judgment motion. Drafting, checking citations for statement of uncontroverted facts for summary judgment motion.

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3/5/2012	Kevin Bayley	1.00	Other/Miscellaneous	Meeting with Andy and Rachel re: help on summary judgment motion (0.6). E-mailing them detailed instructions (0.4).
3/5/2012	Kevin Bayley	0.20	Other/Miscellaneous	Discussing setting of next mediation date (0.1) and formatting of uncontroverted facts (0.1) with paralegal (0.1).
3/5/2012	Kevin Bayley	0.70	Other/Miscellaneous	E-mails with co-counsel re: setting up conference call to discuss summary judgment (0.4) and discussing recent declarations received (0.3).
3/5/2012	Kevin Bayley	1.10	Other/Miscellaneous	Reviewing expert declaration requirements (0.7). Drafting my declaration for summary judgment motion (0.4).
3/6/2012	Kevin Bayley	0.50	Other/Miscellaneous	Phone call with (0.3) and e-mail to (0.2) Jessica Price re: review of portions of record for summary judgment facts.
3/6/2012	Kevin Bayley	2.00	Other/Miscellaneous	Call with co-counsel re: summary judgment drafting, other case updates (0.9). Reviewing new declarations (0.3). Legal research on judicial notice (0.4). Drafting judicial notice pleading (0.4).
3/6/2012	Kevin Bayley	6.80	Other/Miscellaneous	Drafting summary judgment motion. Drafting, checking citations for statement of uncontroverted facts for summary judgment motion.
3/7/2012	Kevin Bayley	6.10	Other/Miscellaneous	Phone call with Dr. Hill re: declaration drafting (0.4). Meeting with Melinda re: expert declaration requirements (0.4). Review of expert reports (0.8). Call with co-counsel re: summary judgment drafting (0.4). Call/e-mail to opposing counsel re: dispositive motion dates (0.4). Editing statement of uncontroverted facts, review of plaintiff depositions (3.7).
3/8/2012	Kevin Bayley	2.10	Other/Miscellaneous	Meeting with Melinda and Autumn re: SJ motion re-drafting (1.2). Reviewing Melinda and Michelle U. comments on draft and SUF (0.4). E-mail from Justin re: proposed stip (0.1). Call to (v/m left)(0.1) and e-mail to Justin re: proposed stip (0.1). Meeting with Rachel re: MH aspects of case (0.1). E-mail to Andy and Rachel re: MH aspects of case, meeting re: same (0.1).

3/9/2012	Kevin Bayley	2.70	Other/Miscellaneous	Call with Justin re: stipulation on dates (0.3). E-mails with same re: same (0.3). Discussion with paralegal re: edits to stip (0.2), re: filing (0.1). E-mails with co-counsel re: briefing schedule (0.3). Voicemail (0.1) and phone call (0.2) with Michelle Uzeta re: briefing schedule. Meeting with Melinda re: bifurcating of SJ motion (0.1). E-mails with co-counsel re: case planning meeting (0.2). Meeting with Andy and Rachel re: MH record review (0.3). Prepping for same (0.2). Review of co-counsel edits on Summary Judgment motion (0.5).
3/12/2012	Kevin Bayley	0.90	Other/Miscellaneous	Voicemail (0.1), phone call (0.1) and reading Rachel's memo (0.3) re: MH issues of selected clients. E-mails with co-counsel re: in-person meeting, settlement agreement draft, etc. (0.4).
3/13/2012	Kevin Bayley	1.70	Other/Miscellaneous	Meeting with Melinda and Monisha re: facts of case (0.4). Discussing mental health records with Andy (0.3). Review of files with paralegal (0.2). Reviewing, drafting SUF (0.8).
3/14/2012	Kevin Bayley	4.10	Other/Miscellaneous	Review of depositions of Joe Gonzalez, Michael Curfman, Peter Johnson to draft facts for SJ motion (3.6). E-mails with colleagues and co-counsel re: record review (0.3) and next in-person meeting (0.2).
3/15/2012	Kevin Bayley	1.20	Other/Miscellaneous	Meeting with Monisha re: case background (0.5). reviewing new declaration (0.1), and complaints (0.1). Reviewing Michelle's notes to settlement agreement draft (0.3). E-mails with co-counsel re: same (0.2).
3/19/2012	Kevin Bayley	2.70	Other/Miscellaneous	Meeting with Monisha Coehlo re: SJ motion (2.3). Reviewing SUF changes made by Jessica (0.3). E-mailing co-counsel re: Wednesday meeting (0.1).
3/20/2012	Kevin Bayley	2.40	Other/Miscellaneous	Drafting outline of summary judgment motion (2.1). E-mails with co-counsel re: moving date of meeting (0.3).
3/21/2012	Kevin Bayley	0.30	Other/Miscellaneous	Review of new declarations in case.
3/21/2012	Kevin Bayley	1.10	Other/Miscellaneous	Working on re-drafting of introduction of summary judgment motion.
3/22/2012	Kevin Bayley	1.10	Other/Miscellaneous	Re-drafting intro and statement of facts for summary judgment motion.
3/26/2012	Kevin Bayley	2.80	Other/Miscellaneous	Researching standard from Pierce, Turner, Gates (1.2). Drafting language re: standard (0.7). E-mails with colleagues re: summary judgment briefing (0.9).

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3/28/2012	Kevin Bayley	3.90	Other/Miscellaneous	Voicemail from and phone call to Jessica Price re: today's meeting agenda (0.1). Reviewing documents/drafting agenda to prepare for meeting (0.3). Meeting with co-counsel re: summary judgment, mediation strategies (2.9). Travel to/from meeting (0.3). Meeting with Melinda re: summary judgment tasks (0.3).
3/29/2012	Kevin Bayley	2.50	Other/Miscellaneous	Reading letters from CRDF inmate passed along by Armstrong counsel (0.8). E-mailing Armstrong counsel re: letters (0.4). E-mailing co-counsel re: letters (0.1). Editing settlement agreement outline based on comments from yesterday's meeting (1.2).
4/2/2012	Kevin Bayley	0.80	Other/Miscellaneous	Review and e-mail co-counsel re: declarations (0.6). Discussing status of latest stipulation order with support staff (0.2).
4/3/2012	Kevin Bayley	0.60	Other/Miscellaneous	Drafting letter to opposing counsel re: settlement outline (0.5). Reviewing dates in stipulation signed by judge (0.1).
4/5/2012	Kevin Bayley	0.80	Other/Miscellaneous	Reviewing Michelle Uzeta changes to Johnson settlement agreement drafts (0.3). E-mails with colleagues (0.2) co-counsel (0.3) re: class member in CTC.
4/6/2012	Kevin Bayley	1.20	Other/Miscellaneous	Phone call from PD for class member (0.4); follow-up e-mail (0.1). Phone calls with Jessica Price re: settlement outline (0.1) and class member PD call (0.1). E-mails with co-counsel re: trips to jail for declarations (0.3). Discussing settlement outline with Melinda (0.2).
4/9/2012	Kevin Bayley	2.70	Other/Miscellaneous	Meeting with Melinda re: draft outline (0.2). Revising outline and correspondence with opposing counsel (1.3). E-mails with Co-counsel re: same (0.3). reviewing draft declaration of Larry Trujillo (0.4). E-mails with co-counsel re: same (0.3). Review of jail hippa releases (0.2).
4/9/2012	Kevin Bayley	0.30	Other/Miscellaneous	E-mails with co-counsel re: current issues in case, meetings.
4/10/2012	Kevin Bayley	2.90	Other/Miscellaneous	revising settlement outline to opposing counsel (0.8). Revising letter to opposing counsel (0.4). E-mails with co-counsel re: settlement outline (0.5). Reading Austin report re: closing of men's central jail (0.9). Discussing edits to settlement documents with Melinda (0.3).
4/12/2012	Kevin Bayley	1.10	Other/Miscellaneous	Discussing settlement developments with Melinda (0.2). Reading MA case re: settlement under PLRA (0.7). Call from Michelle and Umbreen re: settlement briefing(0.2).

4/13/2012	Kevin Bayley	3.60	Other/Miscellaneous	Review of Logan Hopper reports re: accessibility issues at LASD facilities for uncontroverted facts (3.2). Review of correspondence from opposing counsel (0.1). Call to opposing counsel (0.1). E-mails with co-counsel re: correspondence with opposing counsel (0.2).
4/17/2012	Kevin Bayley	0.80	Other/Miscellaneous	Review of recent declarations (0.5). e-mail to expert Terry Hill re: upcoming mediation session (0.1). Settlement agreement review (0.2).
4/18/2012	Kevin Bayley	0.30	Other/Miscellaneous	E-mails with Expert Terry Hill re: availability for next mediation session.
4/18/2012	Kevin Bayley	0.40	Other/Miscellaneous	Phone call with Steve Smerek re: mediation issues.
4/18/2012	Kevin Bayley	0.40	Other/Miscellaneous	review draft settlement brief.
4/19/2012	Kevin Bayley	2.20	Other/Miscellaneous	E-mail with co-counsel re: settlement brief drafting (1.4). Editing settlement brief (0.8).
4/20/2012	Kevin Bayley	0.60	Other/Miscellaneous	Review of drafts of settlement brief from co-counsel (0.3). E-mails with co-counsel re: mediation schedule (0.3).
4/22/2012	Kevin Bayley	2.40	Other/Miscellaneous	Reviewing Logan Hopper 2008 report for facts for SJ motion.
4/23/2012	Kevin Bayley	1.70	Other/Miscellaneous	Meeting with opposing counsel re: upcoming mediation (0.1). review of draft settlement agreements (0.4). Editing settlement agreement (0.5). Call with co-counsel (0.7).
4/24/2012	Kevin Bayley	0.30	Other/Miscellaneous	review of settlement agreement, e-mails re: same.
4/25/2012	Kevin Bayley	0.80	Other/Miscellaneous	e-mails with co-counsel re: new mediation date (0.3). Review of deference standards article (0.5).
4/26/2012	Kevin Bayley	0.90	Other/Miscellaneous	Review of PLRA deference standard (0.4). Review of Dr. Hill reports (0.5).
5/2/2012	Kevin Bayley	0.20	Other/Miscellaneous	Meeting with Melinda Bird re: SUF work/timeline of mediation (0.1). Call/voicemail to Michelle Uzeta re: mediation/case timeline (0.1).
5/3/2012	Kevin Bayley	0.10	Other/Miscellaneous	Phone call with Michelle Uzeta re: mediation dates.
5/7/2012	Kevin Bayley	0.20	Other/Miscellaneous	E-mails with co-counsel re: mediation, other settlement developments.
5/11/2012	Kevin Bayley	1.40	Other/Miscellaneous	Review of evidence, drafting uncontroverted facts.
5/14/2012	Kevin Bayley	0.40	Other/Miscellaneous	E-mails with co-counsel re: case developments, setting up further discussion.
5/14/2012	Kevin Bayley	0.20	Other/Miscellaneous	Review of draft continuance of dates.

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5/15/2012	Kevin Bayley	0.50	Other/Miscellaneous	E-mail from (0.2) and phone call with Michelle Uzeta re: scope of case, possible overlap with other DRLC cases and how that affects settlement of each.
5/17/2012	Kevin Bayley	1.80	Other/Miscellaneous	reviewing depositions to draft summary judgment facts (1.4). Call with co-counsel re: settlement strategy, stipulation re: dates (0.4).
5/18/2012	Kevin Bayley	3.90	Other/Miscellaneous	E-mails with paralegal re: changing funding splits (0.2). Drafting summary judgment facts (3.7).
5/22/2012	Kevin Bayley	0.50	Other/Miscellaneous	E-mails (0.2), Call (0.3) with Michelle Uzeta re: case files, retainers, settlement.
5/23/2012	Kevin Bayley	1.00	Other/Miscellaneous	Call with Michelle re: class rep retainers (0.1). E-mails with paralegal re: opening new SR's (0.2). E-mails with co-counsel re: opposing counsel contact, possible meeting, settlement strategy (0.5). Review of draft stipulation continuing dates (0.2).
5/24/2012	Kevin Bayley	2.70	Other/Miscellaneous	Reviewing evidence, draft uncontroverted facts (2.5). E-mails re: stipulation extending dates (0.2).
5/25/2012	Kevin Bayley	6.40	Other/Miscellaneous	Reviewing discovery to draft statement of uncontroverted facts.
5/29/2012	Kevin Bayley	0.50	Other/Miscellaneous	review of e-mails from co-counsel and opposing counsel re: upcoming meetings between the parties (0.3). Review of stipulation between parties (0.2).
5/30/2012	Kevin Bayley	0.30	Other/Miscellaneous	Call with co-counsel re: case updates.
5/31/2012	Kevin Bayley	0.30	Other/Miscellaneous	E-mails with Pamila re: call from PD with client with mobility issues at jail.
6/6/2012	Kevin Bayley	0.60	Other/Miscellaneous	review of hand-written declaration from William Coney (0.3). Review of CDCR website, client depositions to determine current client locations (0.3).
6/7/2012	Kevin Bayley	0.50	Other/Miscellaneous	Review declarations from inmates (0.3). E-mails with co-counsel re: same (0.2).
6/8/2012	Kevin Bayley	0.20	Other/Miscellaneous	Review of signed stipulation moving dates, e-mails with co-counsel re: same.
6/11/2012	Kevin Bayley	0.50	Other/Miscellaneous	E-mails with co-counsel re: mediation strategy.
6/28/2012	Kevin Bayley	1.80	Other/Miscellaneous	Review of e-mails, documents sent during my absence, including settlement response from defendants.

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7/2/2012	Kevin Bayley	0.70	Other/Miscellaneous	Reviewing initial disclosures (0.1). Discussion with co-counsel re: names to include (0.4). E-mails with co-counsel re: 7/11 meeting with opposing counsel (0.2).
7/3/2012	Kevin Bayley	0.30	Other/Miscellaneous	Review of e-mails re: upcoming call. E-mails with co-counsel re: disclosures.
7/5/2012	Kevin Bayley	0.80	Other/Miscellaneous	Review of Draft settlement agreement, comments from each side.
7/6/2012	Kevin Bayley	1.80	Other/Miscellaneous	Call with co-counsel re: settlement agreement changes (0.7). Reviewing legal standards for mobility impairment, other terms in settlement agreement (0.5). Reviewing, commenting on drafts of settlement agreement (0.6).
7/10/2012	Kevin Bayley	1.00	Other/Miscellaneous	Review draft settlement agreement (0.4). Review info re: tamper-free wheelchairs (0.4). E-mails from co-counsel, opposing counsel re: meeting on 7/11 (0.2).
7/11/2012	Kevin Bayley	2.90	Other/Miscellaneous	Prep for meeting with opposing counsel, co-counsel re: settlement discussions (1.3). E-mails with opposing and co-counsel re: meeting (0.3). Meeting with opposing counsel and co-counsel re: settlement discussions (1.0). Meeting with co-counsel to de-brief on the settlement discussions (0.3).
7/13/2012	Kevin Bayley	1.40	Other/Miscellaneous	Review/comment on new draft of settlement agreement (0.8). Review of legal research on segregation of populations w/in jail (0.6).
7/16/2012	Kevin Bayley	1.00	Other/Miscellaneous	Call with co-counsel re: draft settlement agreement, mediation strategy (0.6). Reviewing auditor/controller's report re: MSB, news articles re: same (0.4).
7/20/2012	Kevin Bayley	0.40	Other/Miscellaneous	Reviewing case time records for typos, other issues to prepare for mediation.
7/23/2012	Kevin Bayley	1.20	Other/Miscellaneous	Review of time entries (0.8). E-mails with co-counsel re: mediation planning (0.3). Phone call with Jessica Price re: mediation planning (0.1).
7/24/2012	Kevin Bayley	0.40	Other/Miscellaneous	Reviewing time records.

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7/30/2012	Kevin Bayley	1.90	Other/Miscellaneous	Review and editing of supplemental mediation brief (1.1). Voicemail to expert Terry Hill (0.1). Call with Dr. Hill re: case developments, availability for upcoming mediation (0.3). E-mail with co-counsel re: mediation brief, discussion of other issues for upcoming mediation (0.4).
7/31/2012	Kevin Bayley	1.50	Other/Miscellaneous	Reviewing mediation brief sent to Judge Tevrizian (0.3). Reviewing materials for mediation (0.2). Sending materials to paralegal for preparation for mediation (0.1). Editing time entries (0.7). Review of costs (0.2).
8/1/2012	Kevin Bayley	0.50	Other/Miscellaneous	Discussing time entries for fee request with Melinda (0.1). Discussing same with paralegal (0.1). Reviewing time records (0.3).
8/1/2012	Kevin Bayley	0.40	Other/Miscellaneous	E-mails with Jessica Price re: fees (0.2). Reviewing settlement revisions sent by opposing counsel (0.1). E-mailing co-counsel re: settlement revisions (0.1).
8/2/2012	Kevin Bayley	0.50	Other/Miscellaneous	Review of Michelle's e-mails re: (0.1), edits to settlement agreement (0.3). E-mails to co-counsel re: comments on new draft (0.1).
8/6/2012	Kevin Bayley	4.10	Other/Miscellaneous	Call with co-counsel re: prep for mediation on 8/7 (0.8). Calls to Jason Hamilton (0.1) and Steve Smerek (0.1) re: availability for mediation, Winston fees. Call from Jason re: same (0.1). E-mails with Michelle Uzeta re: mediation briefs (0.4). E-mails with Michelle Uzeta re: fees to date (0.3). Review, editing of internal fee chart (0.8). Review of paralegal's fee chart (0.1), discussing with paralegal (0.1) and Melinda (0.1). Review of Winston fees (0.1). Prep for mediation by review of mediation briefs, draft settlement agreement (0.9). Writing notes re: call with co-counsel, sending to Melinda (0.2).
8/7/2012	Kevin Bayley	7.30	Other/Miscellaneous	Reviewing materials to prep for mediation (0.7). Travel to/from mediation (0.5). Attending mediation (6.1).
8/8/2012	Kevin Bayley	0.30	Staff Meeting / General Case Conferencing	Review of material from Jessica Price to Chief Yim re: inmates having issues.
8/9/2012	Kevin Bayley	0.40	Other/Miscellaneous	Review of notes from mediation (0.2). Drafting action items for information needed for revision of settlement agreement (0.2).

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8/14/2012	Kevin Bayley	1.30	Other/Miscellaneous	Reviewing Deposition transcripts, policies and procedures received in discovery to determine what current procedure is for signifying that inmate receives a wheelchair or lower bunk (0.9). Memorializing results of research (0.4).
8/15/2012	Kevin Bayley	2.80	Other/Miscellaneous	Reviewing Johnson discovery for policies to monitor.
8/16/2012	Kevin Bayley	3.30	Other/Miscellaneous	Reviewing new draft of settlement agreement (0.6). Call to Dr. Hill (0.1). Call to Merlexi wheelchair maker (0.1). Review of discovery for policies and procedures we need to review during monitoring (2.5).
8/17/2012	Kevin Bayley	2.00	Other/Miscellaneous	Review and editing of Settlement Agreement (0.5). Drafting listing of documents to be monitored (1.2). E-mail to co-counsel re: same (0.3).
8/20/2012	Kevin Bayley	1.00	Other/Miscellaneous	E-mails with Michelle Uzeta re: leading conference call (0.2). Attempting to get on conference call (0.1). Call with Jessica Price re: settlement agreement draft (0.2). Reviewing discovery requests for list for complications provided by Dr. Hill (0.2). Revising Settlement agreement (0.3).
8/21/2012	Kevin Bayley	0.60	Other/Miscellaneous	Review of e-mails discussing settlement agreement changes (0.2). Phone call with Michelle Uzeta re: settlement agreement changes (0.4).
8/22/2012	Kevin Bayley	0.40	Other/Miscellaneous	E-mails with co-counsel re: fee records (0.4).
8/23/2012	Kevin Bayley	0.50	Other/Miscellaneous	Discussing settlement agreement changes with Melinda (0.1). Reviewing new draft of settlement agreement (0.1). E-mailing comments re: settlement agreement to co-counsel (0.1). E-mails with co-counsel re: named plaintiff Joe Gonzalez's situation at jail (0.2).
9/5/2012	Kevin Bayley	0.20	Other/Miscellaneous	Review of e-mail/materials from Melinda re: new project with Andy on wheelchair assessments (0.2).
9/6/2012	Kevin Bayley	0.20	Other/Miscellaneous	Meeting with Melinda re: possible post-settlement issues.
9/10/2012	Kevin Bayley	0.20	Other/Miscellaneous	Reviewing e-mails re: new developments, upcoming calls.
9/12/2012	Kevin Bayley	0.40	Other/Miscellaneous	E-mails with co-counsel re: new allegations of wheelchairs being removed.

9/13/2012	Kevin Bayley	1.50	Other/Miscellaneous	Calls with Jessica Price re: letter to defendant's counsel re: Joe Gonzalez, other wheelchair extractions recently (0.3). Revising letter (1.2).
9/14/2012	Kevin Bayley	3.20	Other/Miscellaneous	Editing letter to defendants re: recent incidents of inmates being removed from wheelchairs (1.4). Meeting with Andy re: wheelchair assessment standards (0.4). Reviewing standards documents (1.1). Online research, phone calls to standards authors (0.3).
9/17/2012	Kevin Bayley	0.60	Other/Miscellaneous	E-mails with co-counsel re: letter to opposing counsel and upcoming meetings (0.4). Researching LASD officers Ornelas and Parra (0.2).
9/18/2012	Kevin Bayley	0.30	Other/Miscellaneous	Discussing logistics for 9/27 meeting with opposing counsel at DRC with support staff.
9/19/2012	Kevin Bayley	0.90	Other/Miscellaneous	Review of letter from Paul Beach answering my letter of 9/14 (0.3). E-mails with colleagues re: responses to his letter (0.4). E-mail with co-counsel re: judge Tevrizian's availability (0.2).
9/24/2012	Kevin Bayley	1.40	Other/Miscellaneous	Call with co-counsel re: prep for upcoming meeting at DRC offices with opposing counsel (0.8). Review of e-mails from Michele Magar re: documents needed for her draft of complaint procedures (0.2). Review of probation case settlements, sending to Michele (0.4).
9/26/2012	Kevin Bayley	0.20	Other/Miscellaneous	E-mails with c-counsel re: cancellation of 9/27 meeting with opposing counsel.
9/27/2012	Kevin Bayley	0.20	Other/Miscellaneous	Discussing Dates for upcoming meeting with opposing counsel with Melinda (0.1). E-mailing information to Michelle Uzeta (0.1).
9/28/2012	Kevin Bayley	0.10	Other/Miscellaneous	Phone call with Jessica Price re: Judge Tevrizian's contact info.
10/1/2012	Kevin Bayley	0.20	Other/Miscellaneous	E-mails with colleagues re: scheduling in-person meeting with opposing counsel.
10/2/2012	Kevin Bayley	0.30	Other/Miscellaneous	E-mails with paralegal, Michelle re: scheduling mediation before Tevrizian.
10/5/2012	Kevin Bayley	0.60	Other/Miscellaneous	E-mail with co-counsel re: upcoming meeting with opposing counsel logistics, strategy.
10/8/2012	Kevin Bayley	1.30	Other/Miscellaneous	E-mails with co-counsel re: 10/9 meeting strategy (0.4). Phone call re: same (0.9).
10/8/2012	Kevin Bayley	0.30	Other/Miscellaneous	Review letter from inmate passed along by J. Price.

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10/9/2012	Kevin Bayley	3.00	Other/Miscellaneous	Prep for meeting by reviewing settlement draft documents (0.8). Travel to/from meeting at DRLC (0.8). Meeting at DRLC (1). E-mails with Jessica Price re: new client (0.4).
10/11/2012	Kevin Bayley	0.50	Other/Miscellaneous	E-mails with Pamila Lew re: report from PD re: issues at jail.
10/15/2012	Kevin Bayley	0.80	Other/Miscellaneous	Reviewing order on class certification (0.2). E-mails with co-counsel re: same (0.3). Phone call from (0.1) and with Jessica Price re: response to same (0.2).
10/16/2012	Kevin Bayley	0.40	Other/Miscellaneous	Review of draft press releases, final.
10/25/2012	Kevin Bayley	0.20	Other/Miscellaneous	Review of new discovery document sent by defendants (0.2).
10/25/2012	Kevin Bayley	0.20	Other/Miscellaneous	Discussing new discovery with Melinda (0.1). Sending same to co-counsel (0.1).
11/5/2012	Kevin Bayley	0.30	Other/Miscellaneous	Call with co-counsel re: new declarants, relevant upcoming deadlines.
11/6/2012	Kevin Bayley	0.20	Other/Miscellaneous	E-mails with support (0.1) and co-counsel (0.1) re: scheduling next mediation session.
11/13/2012	Kevin Bayley	0.30	Other/Miscellaneous	E-mails with co-counsel re: scheduling January mediation date.
11/19/2012	Kevin Bayley	0.50	Other/Miscellaneous	E-mails with co-counsel re: mediation scheduling (0.3). E-mail to opposing counsel re: same (0.2).
11/30/2012	Kevin Bayley	0.40	Other/Miscellaneous	Discussions with colleagues/co-counsel re: possibly related case.
12/4/2012	Kevin Bayley	0.30	Other/Miscellaneous	E-mails with Michelle U. re: MSJ drafting, other case updates.
12/5/2012	Kevin Bayley	0.50	Other/Miscellaneous	Reviewing drafts of MSJ and facts found on U: drive.
12/11/2012	Kevin Bayley	0.20	Other/Miscellaneous	E-mails with opposing counsel re: next mediation session
12/11/2012	Kevin Bayley	0.30	Other/Miscellaneous	Review e-mail from J. Price re: potential client, looking up in inmate locator.
12/13/2012	Kevin Bayley	0.20	Other/Miscellaneous	E-mail to Melinda relaying Michelle U.'s questions.
12/18/2012	Kevin Bayley	0.70	Other/Miscellaneous	Meeting with Melinda re: SUF areas to be filled in (0.3). Reviewing drafts of SUF on our systems (0.4).
1/2/2013	Kevin Bayley	0.40	Other/Miscellaneous	Review materials from Terry Alexander via J. Price.
1/8/2013	Kevin Bayley	0.50	Other/Miscellaneous	Review email from co-counsel re: inmate in LA Jail system (0.1). Looking up inmate in system and reviewing Armstrong procedures (0.3). Sending e-mail to co-counsel re: same (0.1).
1/22/2013	Kevin Bayley	0.30	Other/Miscellaneous	Johnson: e-mailing co-counsel re: possible dates.

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1/24/2013	Kevin Bayley	0.60	Other/Miscellaneous	Discussing possible mediation dates with Melinda (0.1). Phone call to (0.1) and e-mail from (0.1) Steve Smerek re: same. E-mail to opposing counsel re: our availability (0.1). Review of e-mails from Michelle, Melinda re: review/QA process as part of settlement (0.2).
1/25/2013	Kevin Bayley	0.40	Other/Miscellaneous	E-mails with co-counsel re: possible records to pull for review.
1/28/2013	Kevin Bayley	0.20	Other/Miscellaneous	E-mails re: setting up discussion with co-counsel re: medical records to be reviewed.
2/8/2013	Kevin Bayley	0.80	Other/Miscellaneous	review of mediation notes re: ADA contacts for facilities, e-mails with Jessica Price re: current people performing those duties & her letter to potential class members.
	Kevin Bayley Total	1320.30		
4/6/2010	Melinda Bird	1.50	Other/Miscellaneous	JOHNSON - conf call with co-counsel, .5; review new intake from Ortiz, draft memo re tasks, .5; meet with R Scherer re time to interview Ortiz, follow-up, .4; review and respond to memos from D Dorfman re assignments, new case opening. .1
4/7/2010	Melinda Bird	0.70	Other/Miscellaneous	JOHNSON - arrange for prep of new co-counseling agreement,.2; conf via email with D Dorfman re staff assignment, new intake re Ortiz, .5
4/12/2010	Melinda Bird	0.20	Other/Miscellaneous	review, edits to Grigsby decl, reference to Wallace
4/16/2010	Melinda Bird	1.70	Other/Miscellaneous	prepare for conf with counsel on Rule 26, review decls, .3; conf with D dorfman re staff assignments, .5; conf with K Bayley re case strategy, .4; conf with R Scherer re 3 clients, outstanding tasks, .5.
4/18/2010	Melinda Bird	0.10	Other/Miscellaneous	emails with D Dorfman re case status
4/18/2010	Melinda Bird	0.20	Other/Miscellaneous	Conf with D dorfman re staffing, strategy
4/19/2010	Melinda Bird	0.50	Other/Miscellaneous	COnt with R Scherer re client transition, files
4/23/2010	Melinda Bird	2.50	Other/Miscellaneous	conf with K Bayley re case, new staffing, .5; review issues, forward background materials, including emails, .7 arrange access to website, work with paralegal, .4; meet with R Scherer and K Bayley re case transfers, status of advocacy, .7; arrangements re conf call on Rule 26, .2
4/26/2010	Melinda Bird	1.30	Other/Miscellaneous	conf with D dorfman, R Scherer re client transfer, client needs
4/27/2010	Melinda Bird	0.60	Other/Miscellaneous	review correspondence, notes re meet and confer, arrange for K Bayley to cover, brief issues with Bayley

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4/28/2010	Melinda Bird	0.80	Other/Miscellaneous	prepare for call with co-counsel, review declarations and edit
4/28/2010	Melinda Bird	0.40	Other/Miscellaneous	review correspondence re rule 26 mtg, brief conf with Kevin B re meeting
4/29/2010	Melinda Bird	0.40	Other/Miscellaneous	conf with K Bayley re Rule 26, Co'ty's position, background pleadings, coverage during his leave
5/16/2010	Melinda Bird	1.50	Other/Miscellaneous	review case openings, update, compose memo to open as MCC, circulate
5/23/2010	Melinda Bird	0.80	Other/Miscellaneous	review case opening memo, update info re client in intake system
6/25/2010	Melinda Bird	1.50	Other/Miscellaneous	prepare for and conf call with co-counsel re rule 26 hearing, who will attend, issues to raise, PI for DRC clients
7/15/2010	Melinda Bird	0.60	Other/Miscellaneous	conf with K Bayley re settlement issues, experts,
7/22/2010	Melinda Bird	0.70	Other/Miscellaneous	conf with Law clerk re research, review memo
8/16/2010	Melinda Bird	2.00	Other/Miscellaneous	conf with K Bayley re experts, draft memo to Armstrong counsel re experts
8/17/2010	Melinda Bird	1.00	Other/Miscellaneous	meet w K Bayley, emails re experts, sent contacts to Kevin,
9/14/2010	Melinda Bird	1.50	Other/Miscellaneous	arrange call with co-counsel, draft agenda, begin task list,
9/15/2010	Melinda Bird	4.00	Other/Miscellaneous	call with co-counsel, 0.3; review discovery schedule, 0.2; conf with K Bayley, 0.5; call with possible expert, 1.0; meet with K Bayley, 0.1; respond to expert, 0.5; draft notes and review files 1.4
9/16/2010	Melinda Bird	0.60	Other/Miscellaneous	follow-up re experts, 0.3; review memos 0.3
9/17/2010	Melinda Bird	2.10	Other/Miscellaneous	research re psychiatrists and draft memo re experts to K Bayley, 1.5; memo to S Parks, tel conf with S. Parks, .6
9/21/2010	Melinda Bird	0.50	Other/Miscellaneous	review memo re new RFPs, respond, 0.3; review drafts 0.2
9/24/2010	Melinda Bird	0.70	Other/Miscellaneous	tel conf with S Parks re discovery, depos, timing of case, meet and confer
9/28/2010	Melinda Bird	3.80	Other/Miscellaneous	review document production, track county's responses, 1.0; draft discovery chart, 1.5; draft letter to county re Dr. Hill, policies, data, 1.3
9/29/2010	Melinda Bird	0.50	Other/Miscellaneous	conf with K Swain re expert
9/30/2010	Melinda Bird	0.50	Other/Miscellaneous	review, respond to memo from M Strugar re depos
10/1/2010	Melinda Bird	3.50	Other/Miscellaneous	meet with K Bayley, 0.6; draft new memo with tasks, 2.0; meet with KB, 0.5; tel conf with M strugar re depos, 0.4
10/5/2010	Melinda Bird	2.20	Other/Miscellaneous	develop and update tasklist, .5; edit client questions,.1; meet with K Bayley, .7; review, edit RFPs, .9;

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10/6/2010	Melinda Bird	5.10	Other/Miscellaneous	review discovery and disclosures, begin edits to RFPs 1.5; draft ltr to Clark re medical expert with list of policies, .5; draft discovery plan for ADA claim, 2.0; review M STrugar memo on possible witnesses, .1; add to RFPs, .6; draft memo to co-counsel re options for medical expert and project costs, .4;
10/7/2010	Melinda Bird	3.80	Other/Miscellaneous	draft emails re agenda for call, .1; begin draft of issues for Hill, 1.5; conf call with co-counsel re depos, discovery, 1.0; prepare memo re additional discovery needed, .3; conf with K Bayley, DD, MF re DRC staffing for the case, .8; review and arrange to file and bring depo notices, .1
10/7/2010	Melinda Bird	3.00	Other/Miscellaneous	review written discovery, draft issues for Hill, 1.0 call with co-counsel re discovery, depos,.7, conf with DD. MF re staffing, .8; review emails and draft agenda for calls, .5
10/8/2010	Melinda Bird	4.50	Other/Miscellaneous	prepare memo re Hill, .5; conf call with Hill, 1.0; edit RFPs, draft interogs, 3.0
10/11/2010	Melinda Bird	1.10	Other/Miscellaneous	close review of and edits to RFA, memo to M STrugar with changes and new drafts
10/15/2010	Melinda Bird	3.80	Other/Miscellaneous	memos to K Bayley re prep for meeting, .5; meet with DRLC, Winston at DRLC offices, review discovery plan, case strategy, set timetable, 2.5; meet with Bayley re releases, chart re obtaining records,.5; identify and forward materials from other cases to Bayley, .3;
10/24/2010	Melinda Bird	2.00	Other/Miscellaneous	review depo questions from MS, SP, review exhibits, draft new questions, circulate
10/26/2010	Melinda Bird	0.20	Other/Miscellaneous	conf with K Bayley re medical records
10/29/2010	Melinda Bird	1.50	Other/Miscellaneous	review and respond to emails, update re depos, 0.4; call w/ co-counsel re: class cert 1.1
11/1/2010	Melinda Bird	0.20	Other/Miscellaneous	arrange/schedule depos
11/2/2010	Melinda Bird	0.50	Other/Miscellaneous	finish DRC class cert decl, arrange for K. Bayley decl and finalize
11/2/2010	Melinda Bird	1.50	Other/Miscellaneous	conf with K Bayley re Hill, records for his review, issues for him to address, case strategy, .7 ; review and edit new draft of class cert motion, .4; review and sort new emails re depos, notes from last meeting, .4

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11/3/2010	Melinda Bird	1.70	Other/Miscellaneous	draft decl, circulate, finalize decl ISO class cert, 1.0; update resume with new case cites, .4; memo to K Bayley re edits, .1; review and attach resumes, send.2
11/4/2010	Melinda Bird	1.10	Other/Miscellaneous	review draft of Hill's report, draft memo to K. Bayley re: prep for Hill's visit, 0.7; respond to memos re: class cert filing, additional points to clarify, 0.4
11/5/2010	Melinda Bird	1.90	Other/Miscellaneous	conf with K Bayley re Hill's visit, .8; draft list of issues to address, .3; review pleadings and list of documents for Hill, identify documents to add, draft cover memo to Hill with new documents, .5; review notes from Greifinger with K Bayley. .3
11/6/2010	Melinda Bird	6.90	Other/Miscellaneous	close review of 4 articles sent by Hill, 1.5; legal research re expert's work in state prisons, review his previous declarations, 3.0; begin index and summary of documents, .6; draft questions for Hill based on documents, 1.0; draft memo to K Bayley re Hill, .5; draft memo to S. Parks on format of joint report, .3
11/7/2010	Melinda Bird	0.50	Other/Miscellaneous	review, respond to cancellation of Hill's trip, draft memo to Hill, .5
11/8/2010	Melinda Bird	5.00	Other/Miscellaneous	prepare for call w/ Hill, 0.5; conf w/ K. Bayley, 0.1; print and review materials re: Hill's background, 0.7; conf w/ T. Hill, 1.5; follow-up w/ K. Bayley, 0.2; review and print PMK depo, RFA, 0.7; emails to counsel re: Hill and review and forward, 0.7; tel conf w/ Shirley Hewey re: ADA, Hill, 0.4; follow-up with Fender/Yim depo, 0.2
11/9/2010	Melinda Bird	3.30	Other/Miscellaneous	tel conf w/ S. Hewey, Rosen and Bien, 0.7; draft and send memo re: potential expert, review responses and forward, 0.5; conf call w/ co-counsel re: class cert, discovery, 1.1
11/10/2010	Melinda Bird	0.20	Other/Miscellaneous	follow up and respond re: class cert
11/11/2010	Melinda Bird	1.70	Other/Miscellaneous	review memo from G. Grunfeld, draft cover memo and forward to co-counsel 0.2; draft memo re: PMK depositions and CDCR, 0.5; additional edits to PMK, 1.0
11/12/2010	Melinda Bird	4.20	Other/Miscellaneous	finish edits to PMK, finalize and circulate, draft cover memo, 3.5; draft memo to Hill and send, 0.2; begin prep for depositions, 0.5
11/13/2010	Melinda Bird	1.20	Other/Miscellaneous	prepare for meeting w/ Hill, memos to K. Bayley re: materials, 0.7; review expert's response re: PMK, 0.5
11/15/2010	Melinda Bird	2.50	Other/Miscellaneous	meet w/ K. Bayley, expert Dr. Hill, 2x

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11/15/2010	Melinda Bird	1.20	Other/Miscellaneous	follow up re: depo transcripts, begin prep for Fender/Yim depositions, 0.8; respond to memos re: class cert briefing schedule, 0.2; review comments on PMK, 0.2
11/16/2010	Melinda Bird	1.30	Other/Miscellaneous	memos re: searching for emails from Com. Fender to prepare for depo., 0.2; review Hill's comment on PMK, draft and send memo re: PMK depo, 0.6; review and respond to memos from co-counsel re: reply on class cert., 0.5
11/18/2010	Melinda Bird	1.00	Other/Miscellaneous	memo re: PMK depo, 0.1; memo to Kevin re: records, 0.6; review memo from K. Bayley to Dr. Hill re: contentions, 0.3
11/23/2010	Melinda Bird	3.00	Other/Miscellaneous	review binder w/ 2008 expert documents, copy and send to Hill w/ summary, 1.5; review corr. re: complaints from named plaintiffs, respond to M. Strugar w/ documentation, 0.6; conf call w/ team (8:30am), 0.7; review notes, 0.2
11/24/2010	Melinda Bird	3.40	Other/Miscellaneous	locate emails to and from Fender 0.5; tel conf. w/ B. Gibson re: costs 0.2; draft memo to D. Schur 0.1; review new deadlines, tel conf w/ L.D. 0.3; review new documents 0.8; draft memo to Hill 0.5; review calendar deadlines, memo to staff re: depo 0.2; tel conf w/ M. Strugar re: Yim depo 0.8
11/26/2010	Melinda Bird	1.20	Other/Miscellaneous	review LASD website to prepare for Yim/Fender depositions, draft summary
11/29/2010	Melinda Bird	2.40	Other/Miscellaneous	read Baker depo, 0.5; conf w/ ADA expert re: draft report, 0.5; review 2nd expert's report, e-mail from K. Bayley, 0.6; draft memo to K. Bayley re: report, 0.4; memo and calculate timing for Monday filing, 0.4
11/30/2010	Melinda Bird	1.40	Other/Miscellaneous	conf w/ K. Bayley re: summary, next steps, 0.6; call and memo to Matthew Strugar re: Hill report, background materials, 0.5; conf call w/ Shawna Parks re: timing of Hill's final report, legal strategy, 0.3
12/1/2010	Melinda Bird	3.20	Other/Miscellaneous	develop revised framework for expert report, 1.5; emails to co-counsel re: Yim depo, plus exhibits, 0.5; review draft Hopper report and comments to S. Parks, 0.4; edits and comments on Yim depo outline, 0.5; review, respond re: new discovery and discipline reports, 0.3

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12/2/2010	Melinda Bird	11.70	Other/Miscellaneous	attend Yim depo, 3.0; prepare for Fender depo, 4.0; review, edit proposed email to opposing counsel re: joint report, 0.2; comments to Hill report, 2.5; review Kevin's notes, make additional comments, draft cover memo to Hill, 2.0
12/3/2010	Melinda Bird	7.30	Other/Miscellaneous	prepare for Fender depo, 1.5; conduct Fender depo, 4.0; conf s/ K. Bayley re: case strategy, Hill report, 1.5; conf w/ J. Clark re: experts, 0.3
12/5/2010	Melinda Bird	4.00	Other/Miscellaneous	review Hill's new draft, Bayley comments to Hill, make further comments
12/6/2010	Melinda Bird	1.90	Other/Miscellaneous	review proposed stip to extend deadline, Clark's response, respond to Parks, 0.5; Conf w/ K. Bayley re: draft, expert report, attachments, 0.5; Pull attachments, scan, 0.4; Further comments on Hill report, 0.5
12/7/2010	Melinda Bird	2.00	Other/Miscellaneous	conf call w/ legal team re: case strategy, close of discovery, 1.0; draft and circulate notes from call, 0.5; respond to emails re: breakdown in process for joint report, 0.5
12/8/2010	Melinda Bird	1.10	Other/Miscellaneous	review and close edit pl. portion of joint report, 0.8; respond to emails re: strategy, 0.3
12/9/2010	Melinda Bird	0.30	Other/Miscellaneous	call w/ P. Eliasberg re: staffing, briefing in additional atty
12/10/2010	Melinda Bird	1.00	Other/Miscellaneous	review discovery demand, arrangements for meeting, 2.0; conf w/ co-counsel re: med. Records, 0.8
1/3/2011	Melinda Bird	0.90	Other/Miscellaneous	conf w/ D. Dorfman re: case status, 0.3; review memos from Clark re: objections to discovery, 0.6
1/4/2011	Melinda Bird	1.10	Other/Miscellaneous	Conf call w/ legal team re: discovery extension, class cert hearing, expert report, 1.1
1/6/2011	Melinda Bird	2.50	Other/Miscellaneous	meet w/ co-counsel to prep for class cert hearing, 2.0; meet w/ K. Bayley re: case assignments, 0.5
1/7/2011	Melinda Bird	0.30	Other/Miscellaneous	draft and circulate memos with depositions summaries, .3
1/10/2011	Melinda Bird	0.70	Other/Miscellaneous	research re: DOJ amicus in Miller, 0.5; draft memo to co-counsel re: Miller, 0.2
1/11/2011	Melinda Bird	1.80	Other/Miscellaneous	review notes from hearing, 0.2; conf call w/ M. Winter re: issues w/ special master, .6; draft PMK for medical expert, 1.0
1/20/2011	Melinda Bird	0.50	Other/Miscellaneous	respond to memos re candidates for master

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1/26/2011	Melinda Bird	0.90	Other/Miscellaneous	review and comment on master stip w/ edits, 0.1; review K. Bayley and workplans, draft response, case plan, 0.8
1/27/2011	Melinda Bird	1.40	Other/Miscellaneous	draft memo re tasks re medical issues, discovery issues, etc; review pierce opinion
1/28/2011	Melinda Bird	1.70	Other/Miscellaneous	meet with K Bayley re task list 2x, 1.0; edit list, draft memos re time records, co-counsel agreement, special master, .7
1/30/2011	Melinda Bird	1.90	Other/Miscellaneous	review memos re ADA in prison, arrange to review, forward materials to K Bayley, 0.4; draft FOF, 1.5
1/31/2011	Melinda Bird	0.30	Other/Miscellaneous	conf with D Schur re case strategy, supervision,
2/14/2011	Melinda Bird	3.70	Other/Miscellaneous	tel conf with K Bayley re Kwan depo, .3; review notes for depo, draft comments, .5; draft new questions re pain evaluation, 1.5; tel conf with M Winter re medical judgment issues, .6; call w/ KB and Jessica P. re: Kwan depo, 0.8
2/15/2011	Melinda Bird	0.50	Other/Miscellaneous	conf with K Bayley, C Blakemore, C Bowles re depo strategy
2/18/2011	Melinda Bird	0.50	Other/Miscellaneous	conf with P Eliasberg re depositions, case strategy
3/7/2011	Melinda Bird	1.00	Other/Miscellaneous	emails re: candidates for master
3/8/2011	Melinda Bird	0.30	Other/Miscellaneous	arrangements for depo review
3/9/2011	Melinda Bird	1.50	Other/Miscellaneous	prepare for depo prep., 0.5; participate in depo session w/ Peter E., others, 1.0
3/11/2011	Melinda Bird	0.30	Other/Miscellaneous	review and forward info on special master candidates
3/14/2011	Melinda Bird	2.50	Other/Miscellaneous	research re: memo to appoint special master, 0.5, conf call w/ co-counsel, 1.2; review EQ & Katie A. drafts, convert to Word, 0.8
3/15/2011	Melinda Bird	4.30	Other/Miscellaneous	draft motion to appoint master, format, 2.5; memo to K. Bayley and J. Price re: research for motion, 0.3; research re: master, Academy of Masters, etc., 1.5
3/16/2011	Melinda Bird	1.30	Other/Miscellaneous	draft memo to Armstrong counsel re: candidates for special master, .7; email to S parks to follow-up re case strategy, .1; research, print and review new 9th cir case on jail conditions, .4; draft memo to co-counsel re same, .1 .
3/17/2011	Melinda Bird	1.00	Other/Miscellaneous	finalize and circulate draft of motion to appoint master
3/18/2011	Melinda Bird	3.50	Other/Miscellaneous	calls w/ Armstrong counsel re: special master candidates, PLRA, 2.5; conf w/ K. Bayley re: PLRA, 0.6; emails to R Rothschild and S Parks re candidates, .3

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3/21/2011	Melinda Bird	2.20	Other/Miscellaneous	conf call w/ co-counsel, 1.0; conf w/ K. Bayley, 0.3; review new memos from Bayley, Price, 0.5; review comments re: mediator candidates, forward, 0.4
3/25/2011	Melinda Bird	1.50	Other/Miscellaneous	conf w/ K. Bayley re: discovery, new demand letters, depositions, 0.8; conf w/ A. Elliot and C. Bowles re: case strategy, staffing, 0.7
3/28/2011	Melinda Bird	4.10	Other/Miscellaneous	conf w/ D. Schur re: case status, 0.5; arrange for call, 0.1; conf w/ K. Bayley re: depositions, 0.2; conf call w/ legal team re: master, depositions, motion to compel, 1.0; review and edit meet and confer letters, 1.0; draft ltr to Co. re: master, 1.0; research re: Armstrong, Rule 706 experts, 0.3
3/29/2011	Melinda Bird	0.20	Other/Miscellaneous	respond re depo schedule, review calendar
3/30/2011	Melinda Bird	1.30	Other/Miscellaneous	Meet with Kevin, Ella H re fact development, study of Falls, .6; conf with Kevin re discovery, .3; conf. with Dara re case staffing, discovery, .4
3/30/2011	Melinda Bird	2.00	Other/Miscellaneous	conf with legal team, 1.0; draft letter re special master and circulate, .7; finalize and arrange to send, .3
3/31/2011	Melinda Bird	0.90	Other/Miscellaneous	review memo re Krisberg as new candidate for master & forward, .4; call w E Galvan re special master issues, .5
4/5/2011	Melinda Bird	2.80	Other/Miscellaneous	review emails and respond re notes from Monday call, .8; review status of special master letter, draft memo to Clark, .5; arrange to send info to G Grunfeld, 1.0; review impact of Armstrong, .5
4/6/2011	Melinda Bird	1.10	Other/Miscellaneous	tel conf with K Bayley re status of depositions, discovery, call with private counsel, .6; review memos from E Hushagen re falls, decl review, .5
4/8/2011	Melinda Bird	0.50	Other/Miscellaneous	tel conf w/ K. Bayley re: case strategy, tracking issues
4/11/2011	Melinda Bird	1.10	Other/Miscellaneous	respond to emails re D White, arrange for followup with R Scherer, .8; review co-counseling agreement, memo to and conf with D Schur re same, .3
4/12/2011	Melinda Bird	2.10	Other/Miscellaneous	conf w r Scherer and K Bayley re client interview, problems, .6; review written docs and emails re same, .2; conf call with S Parks re discovery, .4; review drafts RFAs, memos re scheduling Tavakoli depo, site visits, .4; review Eber decl. re settlement in medical judgment case and circulate, .5

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4/13/2011	Melinda Bird	0.70	Other/Miscellaneous	review Kevin's draft of letter to county re problems with interview, retaliation, .1; draft edits and circulate, .5; review responses to edits, .1; conf with K Bayley, .1
4/14/2011	Melinda Bird	3.00	Other/Miscellaneous	review and edit letter re R Scherer's exp in interview room, draft cover email re changes and more emails, 2x, 1.0; arrangements for in person meeting, .3; review outline for Tavakoli depo, .2; draft additional questions for depositions, 1.0; draft email to Clark re neutral. circulate and send with earlier ltr, .5
4/15/2011	Melinda Bird	0.50	Other/Miscellaneous	review RFAS, discovery
4/19/2011	Melinda Bird	1.20	Other/Miscellaneous	conf w/ R. Scherer re: D. White, other clients, 0.6; edit letter to P. Beach re: master, 0.3; research and review list of candidates, 0.3
4/20/2011	Melinda Bird	3.80	Other/Miscellaneous	conf with co-counsel re TRO, dispositive motions, case strategy, 2.5; draft actions items and circulate, .5; finalize letter to beach and send, .8
4/22/2011	Melinda Bird	0.90	Other/Miscellaneous	review emails re joint stip, Bayley's notes re meetings, motion to compel, emails re white
4/25/2011	Melinda Bird	0.50	Other/Miscellaneous	arrange call re potential mediator, review memos re supp discovery brief
4/26/2011	Melinda Bird	0.90	Other/Miscellaneous	draft and send emails about possible mediator/master, .6; review responses, circulate to co-counsel, .3
4/29/2011	Melinda Bird	0.30	Other/Miscellaneous	review, respond to emails re TRO, forward sample pleadings
5/2/2011	Melinda Bird	1.00	Other/Miscellaneous	conf call w/ team re: strategy, TRO
5/4/2011	Melinda Bird	6.30	Other/Miscellaneous	review draft memo re: TRO, 0.8; edits to introduction, 1.5; draft emails to team, 0.1; conf call w/ co-counsel re: case strategy, discovery, 1.0; research re: discipline diet, 0.7; edits to draft memo, 2.0; memos re: media, 0.2
5/5/2011	Melinda Bird	6.30	Other/Miscellaneous	continued edits to memo, 3.5; email exchange re: cites for brief, research 1.0; arrange re: press release, DRC logo, 0.9; follow-up memos re: filing details, 0.9
5/9/2011	Melinda Bird	0.30	Other/Miscellaneous	send email re: schedule, TRO, demand letter re: mediator
5/10/2011	Melinda Bird	0.60	Other/Miscellaneous	conf w/ Kevin re: site inspection, 0.2; draft and send emails re: edits/changes to ex parte, 0.3; review responses, 0.1
5/14/2011	Melinda Bird	0.90	Other/Miscellaneous	draft memo re: case strategy, 0.8; follow-up emails to legal team re: adding R. Scherer, 0.1

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5/16/2011	Melinda Bird	0.80	Other/Miscellaneous	conf call w/ co-counsel re: case strategy
5/17/2011	Melinda Bird	0.10	Other/Miscellaneous	respond to DRC staff re: decl from new intake
5/18/2011	Melinda Bird	0.90	Other/Miscellaneous	review new messages re: plaintiffs, further interviews
5/19/2011	Melinda Bird	1.00	Other/Miscellaneous	edits to letter to Beach re: mediator, 0.5; finalize and send, 0.5
5/20/2011	Melinda Bird	0.10	Other/Miscellaneous	arrange in-person meeting
5/23/2011	Melinda Bird	2.30	Other/Miscellaneous	conf call w/ legal team re: next steps w/ dispositive motions, mediation, 2.0; review files, respond to emails re: North facility, 0.3
5/26/2011	Melinda Bird	1.60	Other/Miscellaneous	mtg w/ R. Scherer re: Ortiz medical exam, 0.1; meeting w/ K. Bayley re: case strategy, 0.2; review new articles re: jail, 0.8; draft and send email to P. Beach re: mediator, 0.5
5/27/2011	Melinda Bird	1.60	Other/Miscellaneous	review letter from Beach, 0.3; circulate to team, review responses, 0.6; draft email to Beach, 0.5; call Beach, 0.1; finalize and send memo to Beach, 0.1
5/31/2011	Melinda Bird	1.40	Other/Miscellaneous	review response from Clark re: mediator, 0.1; arrange to contact judge, 0.1; tel call w/ Reina, 0.1; conf w/ K. Bayley re: case strategy and coverage, 0.5; circulate 3 emails to legal team re: status of mediation and scheduling, 0.6
6/1/2011	Melinda Bird	0.30	Other/Miscellaneous	arrangements for mediation
6/6/2011	Melinda Bird	0.70	Other/Miscellaneous	draft letter to Beach re: mediator
6/7/2011	Melinda Bird	0.10	Other/Miscellaneous	respond re: strategy meeting arrangements
6/8/2011	Melinda Bird	0.20	Other/Miscellaneous	mediator arrangements, 0.1; strategy meeting arrangements, 0.1
6/9/2011	Melinda Bird	0.30	Other/Miscellaneous	memos re: mediation strategy, plan
6/10/2011	Melinda Bird	0.40	Other/Miscellaneous	conf w/ D. Schur re: case strategy, staffing, 0.3; respond to team re: plans re: named plaintiff at Wasco and new letter from him, 0.1
6/15/2011	Melinda Bird	0.20	Other/Miscellaneous	arrangements for mtg of counsel, 0.1; review order w/ new trial date, 0.1
6/16/2011	Melinda Bird	0.50	Other/Miscellaneous	edit letter to Beach from R. Scherer, 0.2; conf w/ K. Bayley re: relief, mediation, 0.3
6/20/2011	Melinda Bird	0.30	Other/Miscellaneous	review old memos, follow up re: transcript, copying fee, 0.2; respond to question re: ADA issues for women at CRDF, 0.1
6/21/2011	Melinda Bird	0.20	Other/Miscellaneous	review co-counsel agreement, forward to D. Schur
6/24/2011	Melinda Bird	1.30	Other/Miscellaneous	conf w/ Kevin Bayley re: depositions, 0.5; search for Smith testimony from Coleman, 0.8

Attorney Hours 2/8/2010 - 1/31/2013

6/27/2011	Melinda Bird	1.90	Other/Miscellaneous	conf call w/ co-counsel, 0.6; conf - K. Bayley, 0.5; review case p[planning charts, 0.8
6/28/2011	Melinda Bird	3.00	Other/Miscellaneous	review findings of fact, outline for Zasorin deposition, 1.0; review ACLU files, 1.5; attempt to locate Smith transcript, 0.5
6/29/2011	Melinda Bird	8.80	Other/Miscellaneous	conf w/ K. Bayley, J. Price re: results of depo, 0.6; participate in Theophilov deposition, 6.5; review co-counsel agreement w/ D. Schur, 0.6; arrange for depo binders, 0.2; access Winston website and follow-up memo, 0.3; access new password, 0.1; respond to inquiry from Peter Johnson, 0.2; memo to co-counsel re: outstanding tasks, 0.3
6/30/2011	Melinda Bird	0.20	Other/Miscellaneous	review emails, respond re: Armstrong standards
7/1/2011	Melinda Bird	1.50	Draft/Edit	begin new draft of statement of uncontrov facts
7/1/2011	Melinda Bird	0.80	Legal Research	re sum judgment stds
7/1/2011	Melinda Bird	0.30	Other/Miscellaneous	frw doc production to co-coun, arrange in-pers call
7/4/2011	Melinda Bird	2.00	Draft/Edit	workplan for sum judgmt, new edits to uncontrov facts
7/5/2011	Melinda Bird	1.00	Call/Conference Call with/re:	w/co-counsel to plan for mediation, timing on dispositive motions, discovery
7/5/2011	Melinda Bird	0.50	Draft/Edit	begin draft of proposed order
7/5/2011	Melinda Bird	1.00	Legal Research	cont'd research re S.J.
7/6/2011	Melinda Bird	2.00	Draft/Edit	cont'd edits to uncontroverted facts
7/6/2011	Melinda Bird	1.70	Meeting with/re:	w/Kevin B & others to plan dispositive motions
7/6/2011	Melinda Bird	0.20	Other/Miscellaneous	circulate materials to team
7/7/2011	Melinda Bird	0.10	Other/Miscellaneous	follow-up re word versions of DRLC sum judgment calls
7/12/2011	Melinda Bird	0.50	Call/Conference Call with/re:	w/legal team re case strategies, issues for partial S.J.
7/13/2011	Melinda Bird	0.70	Meeting with/re:	w/Kevin B & Rachel S re mtgs w/Armstrong Counsel, legal claims, case strategy, prep for depos
7/15/2011	Melinda Bird	0.40	Draft/Edit	to questions
7/15/2011	Melinda Bird	0.50	Meeting with/re:	w/Kevin B & Rachel S re issues & strategy for depos
7/15/2011	Melinda Bird	0.30	Review	deposition for 301(b)(6)
7/15/2011	Melinda Bird	0.20	Review	notes re PSJ, early motion re PI
7/29/2011	Melinda Bird	0.50	Draft/Edit	notes for team
7/29/2011	Melinda Bird	0.30	Draft/Edit Correspondence/Memo	legal research & draft memo re mootness

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7/29/2011	Melinda Bird	0.80	Meeting with/re:	w/Kevin re sum judgment
7/29/2011	Melinda Bird	0.50	Review	planning charts, prep for mtg w/Kevin
7/30/2011	Melinda Bird	6.50	Draft/Edit Correspondence/Memo	legal research re ADA regs, draft sum j memo
7/31/2011	Melinda Bird	6.50	Draft/Edit Correspondence/Memo	new edits and drafting sum j memo sections re Olmsted claims, re-organize memo, draft cover memo and circulate to team
8/2/2011	Melinda Bird	1.50	Other/Miscellaneous	review additional sections for sum judgment draft
8/3/2011	Melinda Bird	2.00	Other/Miscellaneous	prepare for Burns depo, first draft of questions for Burns
8/3/2011	Melinda Bird	4.00	Other/Miscellaneous	edit draft S.J. memo - draft 3
8/4/2011	Melinda Bird	3.00	Other/Miscellaneous	research re: quotes re: MCJ from Baca, 1.0; review memos from ACLU research re: problems w/ MCJ, 1.0; review revised co-counsel agreement, 0.4; circulate to D. Schur, conf w/ D. Schur re: issues with argument, 0.6
8/6/2011	Melinda Bird	6.50	Other/Miscellaneous	continue drafts and edits to sum. judgment memo, 3.0; prepare for Burns depo, review answers to interros and chart, 3.5
8/7/2011	Melinda Bird	5.80	Other/Miscellaneous	review Hopper reports to add to SJ memo, 0.8; research fed. def. of accessible cell, 0.5; new draft of Burns depo questions, 1.5; check language and references to Fed Reg to add to draft S.J. brief, 3.0
8/8/2011	Melinda Bird	3.80	Other/Miscellaneous	research re: mootness, changes in LASD website, 0.8; additions to Burns depo questions, 1.0; new draft of S.J. memo, 2.0
8/9/2011	Melinda Bird	2.50	Other/Miscellaneous	Burns depo prep, assemble exhibits, 1.5; meet w/ K. Bayley, R. Scherer to review Burns depo strategy, 1.0
8/10/2011	Melinda Bird	6.30	Other/Miscellaneous	prepare topic list for Burns depo, 0.6; conf w/ K. Bayley re: Cruz depo, 1.0; prepare exhibits for Burns depo, 0.4; Burns depo, 3.5; memo to co-counsel re: case strategy, 0.8
8/11/2011	Melinda Bird	0.40	Other/Miscellaneous	review K. Bayley's memo re: meet and confer, respond to questions
8/12/2011	Melinda Bird	0.70	Other/Miscellaneous	conf with K Bayley re UCLA study, relevance to SJ motion, treatment of vulnerable populations.
8/26/2011	Melinda Bird	0.80	Other/Miscellaneous	respond to K. Bayley re Stip, jail visit, ethical issues, review Kevin's' memo and comment,
8/28/2011	Melinda Bird	0.50	Other/Miscellaneous	review outline for Smith depo, circulate comments,
8/29/2011	Melinda Bird	4.00	Other/Miscellaneous	Smith depo, sit in and assess testimony
8/30/2011	Melinda Bird	0.60	Other/Miscellaneous	review mediation brief and confidential supplement, .6; conf with K Bayley re Smith depo, planning for next depos, .5

Attorney Hours 2/8/2010 - 1/31/2013

8/31/2011	Melinda Bird	1.00	Other/Miscellaneous	conf with R Scherer, K Bayley re integration issues, settlement challenges, review tasklist, update assignments for SJ brief,
9/1/2011	Melinda Bird	1.10	Other/Miscellaneous	conf with K Bayley 3x re PMK depo re complaints, questions and progress, .4; discuss re change in co strategy, response in SJ motion, .5; discuss re case staffing, .2
9/1/2011	Melinda Bird	0.40	Other/Miscellaneous	conf w/ K. Bayley re: depo, 0.2; re: case status, 0.2
9/7/2011	Melinda Bird	0.20	Other/Miscellaneous	review and respond re: funding splits
9/12/2011	Melinda Bird	1.00	Other/Miscellaneous	conf call w/ co-counsel re: preparing for mediation
9/14/2011	Melinda Bird	0.80	Other/Miscellaneous	review mediation briefs, exhibits
9/16/2011	Melinda Bird	0.90	Other/Miscellaneous	review and update statement of uncontroverted facts
9/19/2011	Melinda Bird	4.00	Other/Miscellaneous	conf w/ R. Scherer re: SJ draft, 0.5; review earlier versions to re-configure, 1.0; prepare facilities chart w/ updated info, 2.5
9/20/2011	Melinda Bird	3.40	Other/Miscellaneous	edit statement of undisputed facts, new version, new facts, 3.0; memo to paralegal re: fees, 0.1; tel conf w/ K. Bayley re: edits to draft brief, 0.3
9/26/2011	Melinda Bird	1.00	Other/Miscellaneous	review memos, emails, re: mediation fees, 0.2; research, locate rates and forward to paralegal, 0.3; review defendant's mediation brief, 0.5
9/27/2011	Melinda Bird	0.30	Other/Miscellaneous	arrange for binder of new decls, review def. mediation brief
9/28/2011	Melinda Bird	0.70	Other/Miscellaneous	conf w/ K. Bayley re: mediation, next steps, case strategy
9/29/2011	Melinda Bird	0.30	Other/Miscellaneous	review memo from K. Bayley, workplan
9/30/2011	Melinda Bird	0.10	Other/Miscellaneous	respond to co-counsel re: ADA claim
10/3/2011	Melinda Bird	0.90	Other/Miscellaneous	conf call w/ co-counsel re: follow-up from settlement, 0.8; edit ltr to def., 0.1
10/10/2011	Melinda Bird	0.60	Other/Miscellaneous	respond to emails re: client interview, letter to J. Clark re: complaint procedure
11/28/2011	Melinda Bird	0.70	Other/Miscellaneous	conf call w/ co-counsel re: class cert order, case strategy
1/13/2012	Melinda Bird	0.20	Other/Miscellaneous	conf w/ Kevin B. re: settlement mtg w/ Justin Clark, developments in Rutherford re: closing MCJ
1/13/2012	Melinda Bird	1.30	Other/Miscellaneous	conf with K Bayley re settlement, .3; draft memo to counsel, .2; review new Armstrong order, .5; circulate order with memo, .1; review and comment on proposed outline and brief,.2
1/16/2012	Melinda Bird	0.60	Other/Miscellaneous	review draft mediation brief + Armstrong order, .6

Attorney Hours 2/8/2010 - 1/31/2013

1/17/2012	Melinda Bird	2.60	Other/Miscellaneous	review draft mediation brief, .4; conf with K Bayley, .4; draft edits and comments to brief, .7; conf call with co-counsel re mediation position, 1.0; forward Armstrong order, .1
1/30/2012	Melinda Bird	1.20	Other/Miscellaneous	arrangements for call w/ co-counsel, 0.1; conf call w/ legal team, 0.8; conf w/ Kevin re: next tasks, 0.2; arrange next mediation, 0.1
3/1/2012	Melinda Bird	0.30	Other/Miscellaneous	conf with K Bayley re SJ motion, .3
3/2/2012	Melinda Bird	6.50	Other/Miscellaneous	draft memo to K Bayley with steps for SJ motion, .9; conf with C Bowles re assignments, .1; re-organize and edit SUF, 2.0; conf with K Bayley, R Scherer, A Eliot re assignments for SJ, 1.5; review discovery responses from defendants for admissions, .2; locate named plaintiff depo transcripts, .1; locate expert reports and review, including Hopper decl, .5; research re admissibility of expert report on SJ, .4; memo to K Bayley re need for decl for Hill and FRE 702 and 703, .3; review pl discovery responses, mediation briefs to identify undisputed facts/admissions, .5
3/4/2012	Melinda Bird	0.40	Other/Miscellaneous	respond to question from KB re possible new expert from decl., how to use in SJ motion, .3; arrange for next call, .1
3/4/2012	Melinda Bird	3.00	Other/Miscellaneous	draft, edit Hill SUF, Gibbens SUF
3/6/2012	Melinda Bird	1.20	Other/Miscellaneous	review SJ motion, edit w track changes, .9; call with KB re continuance, .3
3/7/2012	Melinda Bird	3.20	Other/Miscellaneous	review SJ facts from RS, others, .2; conf with Bayley re continuance negotiations, .6; continue edits and drafting on SJ motion, 2.5
3/7/2012	Melinda Bird	2.50	Other/Miscellaneous	draft memo re categories in SUF, with notes re each; track changes and comments on current version of SUF
3/8/2012	Melinda Bird	0.50	Other/Miscellaneous	review M Uzeta's edit to SJ, respond re continuance
3/8/2012	Melinda Bird	1.40	Other/Miscellaneous	conf with Bayley re continuance negotiations, .2; final track changes on SJ motion, .5; conf with AE, KB re edits to SJ motion, .7
3/16/2012	Melinda Bird	1.00	Other/Miscellaneous	retrieve drafts and documents re SUF and SJ motion for Monisha and Kevin, .5; conf with Monisha, .5
3/26/2012	Melinda Bird	0.80	Other/Miscellaneous	conf with M Coelho re status of SJ brief, .5; review emails re standard for prima facie case, .3
3/28/2012	Melinda Bird	2.40	Other/Miscellaneous	meeting with co-counsel at ACLU to discuss timing, mediation, settlement posture

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3/29/2012	Melinda Bird	0.60	Other/Miscellaneous	conf with K Bayley re SUF, outcome of meeting with counsel, allocation of lead counsel duties
4/9/2012	Melinda Bird	0.80	Other/Miscellaneous	conf with MC re SJM, .2; conf with KB re ltr to county, .5, review edits from MU and emails, respond, .1
4/10/2012	Melinda Bird	0.80	Other/Miscellaneous	edit settlement outline, cover ltr, .3; conf with KB re same, .5;
4/12/2012	Melinda Bird	0.60	Other/Miscellaneous	conf with M winter re case strategy, observations of tevrizian on commission, integration claims
4/16/2012	Melinda Bird	2.40	Other/Miscellaneous	conf call with co-counsel, .9; draft notes and action items and circulate, .5; listen to testimony at Commission on Jail Violence and response from Tevrizian, 1.0;
7/2/2012	Melinda Bird	0.10	Other/Miscellaneous	review, respond to emails re settlement meeting with county on 7/11
7/6/2012	Melinda Bird	1.50	Other/Miscellaneous	review county's objections to settlement meeting, prepare for next settlement meeting
7/11/2012	Melinda Bird	1.50	Other/Miscellaneous	prepare for and meet with opposing counsel re settlement
7/31/2012	Melinda Bird	0.30	Other/Miscellaneous	review mediation brief to prepare for mediation
8/1/2012	Melinda Bird	0.30	Other/Miscellaneous	conf w/ KB re: atty time, 0.1; review emails re: mediation, new draft settlement agreement from def., 0.2
8/6/2012	Melinda Bird	0.70	Other/Miscellaneous	review new correspondence re: settlement, prepare for mediation, 0.2; conf w/ KB re: fees, lodestar, 0.2; review master fee chart, forward to print, 0.3
8/7/2012	Melinda Bird	6.70	Other/Miscellaneous	mediation w/ Tevrizian, 5.0; conf w/ co-counsel re: legal strategy, 2x, 1.0; conf w/ K. Bayley re: new tasks, 0.2; legal research re: monitoring in jail/prison cases, 0.5
9/4/2012	Melinda Bird	1.50	Other/Miscellaneous	review memo from Jessica Price re: plaintiff complaints, 0.1; draft reply memo re: proposed letter to defs, with Armstrong orders, 0.5; review Armstrong pleading re: monitoring and non-compliance, 0.2; research re: underlying orders, 0.5; arrange to obtain 9th cir briefing on compliance from Armstrong counsel, 0.2
9/5/2012	Melinda Bird	0.70	Other/Miscellaneous	review RESNA standards, memo from Andy B., 0.5; draft memo to Kevin B. re: application to Johnson, 0.2
9/11/2012	Melinda Bird	1.50	Other/Miscellaneous	research re: Armstrong monitoring provisions
10/8/2012	Melinda Bird	0.60	Other/Miscellaneous	conf call with legal team re prep for settlement meeting
10/9/2012	Melinda Bird	0.10	Other/Miscellaneous	memo to team re attendance at settlement, .1

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10/15/2012	Melinda Bird	1.30	Other/Miscellaneous	review new class cert order, .1; respond to emails from co-counsel, .3; review draft of statement re order, .5, NC edit press release, .4
10/15/2012	Melinda Bird	1.00	Other/Miscellaneous	review Armstrong files re monitoring, evidence produced by plaintiffs, .6; develop binder of Armstrong materials, print e files of same, .4;
10/29/2012	Melinda Bird	0.10	Other/Miscellaneous	prepare for, reschedule weekly call, .1
11/12/2012	Melinda Bird	0.70	Other/Miscellaneous	conf call with co-counsel re legal strategy, review of chart of new clients, .7
12/14/2012	Melinda Bird	0.10	Other/Miscellaneous	conf with Kevin B., review KB email, .1;
12/15/2012	Melinda Bird	3.50	Other/Miscellaneous	collect earlier drafts of SJ motion, outline and review, .6; locate earlier drafts of ADA accommodations sections, outline, 1.3; draft memo re SJ issues and mediation, .9; close review of SUF, edits, .7
12/17/2012	Melinda Bird	0.50	Other/Miscellaneous	draft cover memo to co-counsel with latest SJ memo, .2; locate and attach most recent version of SUF from law clerk's old files, .2; respond re setting follow-up call, .1
12/20/2012	Melinda Bird	1.10	Other/Miscellaneous	review and edit SUF, notes for KB for changes, edits, .6; conf with KB re changes, .5
12/20/2012	Melinda Bird	0.20	Other/Miscellaneous	respond to inquires from Armstrong counsel re ADA accommodations in LA jail, .2;
12/21/2012	Melinda Bird	0.20	Other/Miscellaneous	emails with DRLC and ACLU re follow-up call on SJ issues, .2
1/2/2013	Melinda Bird	0.30	Other/Miscellaneous	review email re class rep, respond 2x, .3
1/3/2013	Melinda Bird	0.30	Other/Miscellaneous	respond to Jessica re T Alexander problems, .3
1/7/2013	Melinda Bird	0.50	Other/Miscellaneous	conference call
1/8/2013	Melinda Bird	0.40	Other/Miscellaneous	review letter re class member Flowers, .1; respond re follow-up, .2; 2nd response, .1
1/24/2013	Melinda Bird	0.80	Other/Miscellaneous	review memo from M Uzeta, .1; draft response re settlement options, .5; review and respond to replies, .2
1/25/2013	Melinda Bird	0.50	Other/Miscellaneous	memo re additional issues with settlement proposal, .5
	Melinda Bird Total	403.20		
3/13/2012	Monisha Coelho	1.00	Other/Miscellaneous	Review and analysis of our motion for summary judgment; commence evaluation of revision required
3/15/2012	Monisha Coelho	2.80	Other/Miscellaneous	Analyze motion for summary judgment, complaint and related case documents; complete evaluation of revisions needed; discussion with Kevin B. re: same

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3/16/2012	Monisha Coelho	2.50	Other/Miscellaneous	Meeting with Kevin to review requirements for summary judgment brief; discuss and create revised outline for summary judgment brief to enable revision of same
3/19/2012	Monisha Coelho	3.30	Other/Miscellaneous	Review and analysis of outline drafted by Kevin; conduct further discussion with Kevin re: revisions needed to introduction, fact sections and legal standard for jail cases, in the MSJ brief; draft communication to Melinda re: same
3/20/2012	Monisha Coelho	0.70	Other/Miscellaneous	Discuss edits to MSJ brief
3/22/2012	Monisha Coelho	0.60	Other/Miscellaneous	Discuss necessary legal standard for providing ADA reasonable accommodations to inmates with disabilities while in jail towards revising MSJ brief
3/23/2012	Monisha Coelho	1.30	Other/Miscellaneous	Johnson case files
3/26/2012	Monisha Coelho	1.00	Other/Miscellaneous	Review communication from Kevin re: legal standard; review case law re: legal standard on ADA relief at MSJ stage
3/28/2012	Monisha Coelho	4.50	Other/Miscellaneous	Travel to and from meeting at ACLU to discuss mediation and MSJ brief; detailed review and revision of settlement agreement terms; discuss timing of status conference hearing; discuss revisions and strategy for MSJ brief; discuss changes to MCJ and inmate housing; brief review and analysis of Hopper Report towards preparing MSJ separate statement
	Monisha Coelho Total	17.70		
2/8/2010	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	e-mail to Melinda re: case steps/thoughts
2/8/2010	Rachel Scherer	0.50	Meeting with/re:	client at men's central jail
2/8/2010	Rachel Scherer	0.60	Travel	to/from Men's central jail to meet w/ client (time apportioned for travel for 2 clients met w/)
2/10/2010	Rachel Scherer	0.30	Draft/Edit Correspondence/Memo	draft letter/e-mail for Melinda to consider that raises complaint to MCJ doctor/administration about client's solitary confinement
2/17/2010	Rachel Scherer	0.20	Call/Conference Call with/re:	Melinda B. about next steps in case and dividing up tasks

Attorney Hours 2/8/2010 - 1/31/2013

2/17/2010	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	e-mail to Melinda requesting meeting time to discuss plans to visit client this week
2/25/2010	Rachel Scherer	0.10	Meeting with/re:	Melinda B. about status of case
3/5/2010	Rachel Scherer	0.20	Meeting with/re:	Melinda re: paperwork/damages issues/complaint
3/5/2010	Rachel Scherer	0.10	Meeting with/re:	Melinda B. re: outcome of meeting w/ client today
3/5/2010	Rachel Scherer	0.60	Meeting with/re:	client at MCJ
3/5/2010	Rachel Scherer	0.30	Other/Miscellaneous	intake procedures at Jail; wait for jail to bring client out to meet w/ me; review notes and complaint during this time while waiting
3/5/2010	Rachel Scherer	0.30	Review Pleading/Brief	complaint in Johnson case
3/5/2010	Rachel Scherer	0.50	Travel	to/from Men's central (time for travel apportioned w/ other client visited)
3/16/2010	Rachel Scherer	0.50	Call/Conference Call with/re:	litigation team about next steps in case
3/16/2010	Rachel Scherer	0.30	Meeting with/re:	Melinda B. about key issues to develop in declaration and distinction from damages cases
3/17/2010	Rachel Scherer	0.30	Review Correspondence/Memo	case opening documents to WG from Melinda B., summary of issue, and summary to board
3/18/2010	Rachel Scherer	0.20	Call/Conference Call with/re:	Andy B. in Fresno office about case direction and issues (re: discrim WG call next week)
3/23/2010	Rachel Scherer	0.60	Call/Conference Call with/re:	case conference call with discrim WG about case
3/23/2010	Rachel Scherer	0.10	Call/Conference Call with/re:	Matt F. about how to bill for call and resources issues for case
3/23/2010	Rachel Scherer	0.20	Draft/Edit Correspondence/Memo	list of questions to ask client while waiting for client at jail to arrive to attorney booth
3/23/2010	Rachel Scherer	0.80	Meeting with/re:	client at MCJ
3/23/2010	Rachel Scherer	0.30	Review	client notes while waiting to meet with client

Attorney Hours 2/8/2010 - 1/31/2013

3/23/2010	Rachel Scherer	0.40	Review Correspondence/Memo	memo and materials to prepare for WG case conference call today on topic
3/23/2010	Rachel Scherer	0.30	Review Documents/Records	Declarations of inmates drafted by Matthew S. from DRLC for new amended complaint and original complaint too
3/23/2010	Rachel Scherer	0.70	Review Pleading/Brief	review original complaint from case filed in 2007
3/23/2010	Rachel Scherer	0.50	Travel	to Men's Central Jail and back (time apportioned w/ other client visited as well)
3/24/2010	Rachel Scherer	0.20	Call/Conference Call with/re:	U.S. Dep't of Veteran's Affairs re: records needed and where to send HIPAA release
3/24/2010	Rachel Scherer	0.30	Draft/Edit	case opening paperwork, retainer, and releases
3/24/2010	Rachel Scherer	0.10	Meeting with/re:	Rebecca K. about sending fax out for client
3/25/2010	Rachel Scherer	0.10	Draft/Edit	e-mails with Matthew S. at DRLC regarding damages claim splitting questions
3/26/2010	Rachel Scherer	0.10	Call/Conference Call with/re:	Andy b. about case
3/29/2010	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	notes from meeting w/ Melinda B.
3/29/2010	Rachel Scherer	0.30	Meeting with/re:	Melinda B. about issues in case
3/30/2010	Rachel Scherer	1.40	Draft/Edit	declaration for client
3/30/2010	Rachel Scherer	0.40	Meeting with/re:	Melinda B. about edits to dec
4/1/2010	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	e-mails with Melinda re: case and next steps
4/3/2010	Rachel Scherer	0.80	Meeting with/re:	client re: facts for declaration
4/3/2010	Rachel Scherer	0.30	Other/Miscellaneous	check in at jail and wait to meet w/ client (other time for waiting recorded for other tasks accomplished during that time)
4/3/2010	Rachel Scherer	0.20	Prepare	meeting with client; review file (while waiting); questions to ask client

Attorney Hours 2/8/2010 - 1/31/2013

4/3/2010	Rachel Scherer	0.10	Review	client file and notes
4/3/2010	Rachel Scherer	0.10	Review Correspondence/Memo	e-mails from lit team re: community standards related to wheelchairs
4/3/2010	Rachel Scherer	0.30	Review Documents/Records	declaration for another client (Melinda drafted) in order to learn how to draft declaration for Mr. Grigsby
4/3/2010	Rachel Scherer	0.80	Travel	to/from jail to meet w/ client
4/6/2010	Rachel Scherer	0.30	Call/Conference Call with/re:	call with lit team about next steps in case
4/6/2010	Rachel Scherer	2.00	Draft/Edit Correspondence/Memo	incorporated revisions to declaration based on last meeting w/ client and circulated to lit team
4/6/2010	Rachel Scherer	0.30	Draft/Edit Correspondence/Memo	letter to defense attorney re: representation, and sent to Rebecca for final edits and to send out tomorrow
4/8/2010	Rachel Scherer	0.10	Fact Investigation	obtained info re: client's current housing location
4/8/2010	Rachel Scherer	0.10	Meeting with/re:	jail staff attempting to meet w/ client, but client was out at court today
4/9/2010	Rachel Scherer	0.20	Draft/Edit	releases and printed for meeting w/ client
4/9/2010	Rachel Scherer	0.10	Review Correspondence/Memo	e-mails from Matthew S. at DRLC w/ new dec and questions about complaint
4/10/2010	Rachel Scherer	1.70	Draft/Edit Correspondence/Memo	incorporate edits to client's declaration after meeting w/ client today and printed to bring back to client today to sign
4/10/2010	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	e-mail to lit team w/ dec attached; e-mail to Melinda w/ retainer releases attached
4/10/2010	Rachel Scherer	1.50	Meeting with/re:	client to review declaration, make edits w/ client (interview client and ask more questions), and review some releases
4/10/2010	Rachel Scherer	0.30	Meeting with/re:	evening meeting w/ client to review final draft of declaration, which he signed, and 2 additional releases
4/10/2010	Rachel Scherer	0.20	Prepare	meeting w/ client, review declaration and file while waiting to meet w/ client at jail
4/10/2010	Rachel Scherer	0.10	Prepare	check in through security again today to meet w/ client to review and sign final declaration

4/10/2010	Rachel Scherer	1.10	Travel	travel to/from MCJ to meet w/ client to finalize declaration
4/12/2010	Rachel Scherer	0.90	Draft/Edit Pleading/Brief	draft fact paragraphs for the amended complaint based on client declaration
4/13/2010	Rachel Scherer	0.20	Draft/Edit	incorporated edits to complaint from ACLU for this client
4/13/2010	Rachel Scherer	0.10	Review Correspondence/Memo	review response from Paul Beach, D's counsel, regarding our letter regarding Rule 26 case management conference
4/15/2010	Rachel Scherer	0.10	Meeting with/re:	Rebecca K. about contacting VA and her call with Mr. Grigsby this week
4/20/2010	Rachel Scherer	0.50	Meeting with/re:	client at jail
4/20/2010	Rachel Scherer	0.30	Travel	to/from jail to meet w/ client (total time apportioned for other clients visited)
4/23/2010	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	reviewed lit team e-mails for Johnson case
5/6/2010	Rachel Scherer	0.30	Draft/Edit Correspondence/Memo	edits to records request letter sent to Rebecca K., conf w/ RK re: letter, authority, 0.2; final edits, 0.1
7/2/2010	Rachel Scherer	0.50	Meeting with/re:	to/from MCJ (time apportioned for other clients visited same day)
7/2/2010	Rachel Scherer	0.50	Travel	to/from MCJ (time apportioned for other clients visited same day)
11/29/2010	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	e-mail to MB, MS, and KB re: e-mail MB sent to jail staff as yet another grievance
11/29/2010	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	e-mail to KB, MB, and MS re: new update reviewing file
11/29/2010	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	final follow up thought to MS, MB, and KB
11/29/2010	Rachel Scherer	0.10	Fact Investigation	review e-mails to find e-mail sent to jail staff from past
11/29/2010	Rachel Scherer	0.30	Review	file and notes to look for any concrete evidence of client having filed a grievance on these issues
11/29/2010	Rachel Scherer	0.10	Review Correspondence/Memo	e-mails from MS, MB, and KB re: grievances filed by Columbus Grigsby

Attorney Hours 2/8/2010 - 1/31/2013

3/29/2011	Rachel Scherer	0.10	Meeting with/re:	Kevin to coordinate another meeting time today to review case
3/31/2011	Rachel Scherer	0.20	Call/Conference Call with/re:	Kevin about next steps for depositions and scheduling
4/11/2011	Rachel Scherer	0.10	Call/Conference Call with/re:	Matthew S. at DRLC re: meeting with D. White tomorrow
4/11/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	E-mails with Dara and Melinda about meeting with Derrick White tomorrow at Jail
4/12/2011	Rachel Scherer	0.10	Call/Conference Call with/re:	Jail re: D. White's housing location
4/12/2011	Rachel Scherer	0.60	Draft/Edit Correspondence/Memo	e-mail to co-counsel re: meeting with Mr. White today (very long memo); e-mail to M. Strugar re: client's request for medical records .1
4/12/2011	Rachel Scherer	0.10	Fact Investigation	look up client on inmate locator to get booking number and determine housing location
4/12/2011	Rachel Scherer	0.20	Meeting with/re:	meet w/ Kevin B. re: meeting with D. White today, 0.2; travel to and from jail, 1.0; visit arrangements in attorney room, 1.2; meet w/ client, 1.9
4/12/2011	Rachel Scherer	0.20	Meeting with/re:	MCJ staff re: location of two other class members and location of Nor. County facility
4/12/2011	Rachel Scherer	0.10	Meeting with/re:	Deputy Arriola re: refusal to allow client D. White to pass inmate complaints to me at MCJ
4/12/2011	Rachel Scherer	0.80	Meeting with/re:	Kevin and Melinda about meeting with White today and next steps in case
4/12/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mail from Melinda re: coordination with co-counsel re: who is meeting with client today
4/13/2011	Rachel Scherer	0.10	Call/Conference Call with/re:	Kevin re: ltr to county counsel re: denial of complaints as "in house documents" at MCJ
4/13/2011	Rachel Scherer	0.50	Draft/Edit Correspondence/Memo	edits to Letter to counsel re: denial of complaint
4/13/2011	Rachel Scherer	0.10	Meeting with/re:	Kevin B. about tracking down location of Carlos Ortiz
4/13/2011	Rachel Scherer	0.10	Other/Miscellaneous	follow up call with Kevin re: date complaints filed

Attorney Hours 2/8/2010 - 1/31/2013

4/14/2011	Rachel Scherer	0.80	Draft/Edit	draft supp. declaration for Derrick White
4/14/2011	Rachel Scherer	0.30	Draft/Edit Correspondence/Memo	review/respond to e-mails throughout day to/from Kevin and Melinda on retaliation concerns and ltr to jail staff re: denial of access to inmate complaints (White)
4/14/2011	Rachel Scherer	0.20	Review Documents/Records	2010 declaration of Derrick White in order to draft his supplemental declaration
4/15/2011	Rachel Scherer	1.00	Draft/Edit	finalize drafting suppl. decl derrick white .7; draft my decl. .2; e-mail to co-counsel requesting review .1
4/15/2011	Rachel Scherer	0.20	Fact Investigation	pull housing locations for three inmates who are class reps or class members .1; calls to jail to check particular housing status--line busy .1
4/16/2011	Rachel Scherer	0.20	Draft/Edit	review/edit suppl. decl. of Derrick White
4/16/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mail from Matthew S. re: decl. comments (derrick white)
4/18/2011	Rachel Scherer	0.20	Draft/Edit	suppl. decl. Derrick White
4/18/2011	Rachel Scherer	0.20	Draft/Edit	plug in edits to white Decl from Jessica at ACLU
4/18/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	e-mail to co-counsel re: decls
4/18/2011	Rachel Scherer	0.10	Meeting with/re:	Kevin re: meeting with Carlos Ortiz today
4/18/2011	Rachel Scherer	2.90	Meeting with/re:	clients at MCJ D. White: 1.4; C. Ortiz 1.5
4/18/2011	Rachel Scherer	0.60	Other/Miscellaneous	wait to meet for client White after check-in .2; wait to meet for client Ortiz .4
4/18/2011	Rachel Scherer	0.10	Review	edits to decl from Jessica at ACLU (white)
4/18/2011	Rachel Scherer	1.00	Travel	to/from MCJ to meet with 2 clients (Ortiz and White)
4/19/2011	Rachel Scherer	1.60	Draft/Edit	finalize edits to White Suppl. declaration and circulate to co-counsel

Attorney Hours 2/8/2010 - 1/31/2013

4/19/2011	Rachel Scherer	0.20	Meeting with/re:	Kevin re: meeting with Carlos Ortiz yesterday .1; Kevin re: schedule for upcoming depositions and attending .1
4/19/2011	Rachel Scherer	0.20	Meeting with/re:	Melinda re: case updates in Johnson and next steps (Ortiz and White)
4/20/2011	Rachel Scherer	1.20	Draft/Edit Correspondence/Memo	meeting with co-counsel re: next steps in case
4/21/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	e-mails with Melinda re: case assignments
4/21/2011	Rachel Scherer	0.10	Meeting with/re:	Melinda re: new ADA regs for jails
4/21/2011	Rachel Scherer	0.10	Review	calendar Motion to Compel dates
4/27/2011	Rachel Scherer	0.10	Call/Conference Call with/re:	collect call voice mails from clients at MCJ
4/27/2011	Rachel Scherer	0.10	Review	e-mails re: case
4/27/2011	Rachel Scherer	0.10	Review	notes from Jessica at ACLU on summary of D. White facts
4/27/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mails from co-counsel
4/29/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	e-mail to Jessica at ACLU and co-counsel with latest White decl in word
4/29/2011	Rachel Scherer	0.10	Review	White declaration to find most current version
4/29/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mail from Jessica at ACLU re: White decl follow up and TRO
4/29/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mail from Jessica at ACLU re: possible TRO
4/29/2011	Rachel Scherer	0.10	Review Correspondence/Memo	other co-counsel e-mails re: supp brief and site inspection
4/29/2011	Rachel Scherer	0.10	Review Correspondence/Memo	more e-mails from co-counsel re: motion to compel and TRO
5/2/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mails from Jessica @ ACLU re: White decl.

Attorney Hours 2/8/2010 - 1/31/2013

5/2/2011	Rachel Scherer	0.10	Review Correspondence/Memo	notes from call today (KB)
5/3/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mails with co-counsel re: decls and TRO status and press issues
5/3/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mails from co-counsel re: depositions
5/4/2011	Rachel Scherer	0.50	Call/Conference Call with/re:	call with co-counsel
5/4/2011	Rachel Scherer	0.30	Review	review Hall decl. .1; review White decl. .2
5/4/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mails from co-counsel re: TRO briefs and docs
5/4/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mails among co-counsel with edits to TRO Memo of P&A
5/5/2011	Rachel Scherer	0.10	Review Correspondence/Memo	press release for TRO to be filed today
5/6/2011	Rachel Scherer	0.20	Meeting with/re:	Melinda about my transitioning role on Johnson
5/6/2011	Rachel Scherer	2.40	Meeting with/re:	meeting with Melinda and Kevin to prep for 2 depos next week
5/6/2011	Rachel Scherer	0.30	Meeting with/re:	Kevin re: depos .1; meeting Kevin and Melinda re: depos prior to deciding to set a time for a longer meeting today .2
5/6/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mails from Kevin and Melinda re: site inspection Dr. Hill
5/6/2011	Rachel Scherer	0.50	Review Documents/Records	Johnson binders with discovery docs in Kevin's office & meeting with Kevin on topic
5/9/2011	Rachel Scherer	0.50	Call/Conference Call with/re:	co-counsel re: site visit, TRO, upcoming depos
5/9/2011	Rachel Scherer	1.00	Meeting with/re:	Jessica and Kevin to prep for Dr. Depos later this week and next week
5/9/2011	Rachel Scherer	0.50	Meeting with/re:	follow up meeting with Jessica and Kevin to prep for depos
5/9/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mails from co-counsel re: site inspection

Attorney Hours 2/8/2010 - 1/31/2013

5/9/2011	Rachel Scherer	0.30	Review Pleading/Brief	TRO and ex parte motion
5/10/2011	Rachel Scherer	0.20	Draft/Edit Correspondence/Memo	e-mails to from DRC staff in San Diego re: assistance with client interview in SD, .1; e-mail to Melinda/Kevin re: SD interview of client, .1
5/10/2011	Rachel Scherer	0.10	Other/Miscellaneous	check in with Kevin about depo tomorrow
5/11/2011	Rachel Scherer	0.10	Call/Conference Call with/re:	secretary for Ben Gipson @ Winston about depo today
5/11/2011	Rachel Scherer	0.10	Meeting with/re:	Kevin re: case progress and meeting with client
5/11/2011	Rachel Scherer	0.10	Meeting with/re:	Kevin re: depo today and coordination with Ben at Winston
5/11/2011	Rachel Scherer	0.10	Other/Miscellaneous	e-mails with co-counsel coordinating on call today in light of depo cancelation
5/12/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	e-mail to Kevin and Jessica with signed HIPAA from White for depo
5/12/2011	Rachel Scherer	0.10	Meeting with/re:	Kevin about meeting with client at jail today (white)
5/12/2011	Rachel Scherer	0.30	Review Correspondence/Memo	notes in Carlos Ortiz file and begin to draft decl for him
5/12/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mails re: TRO outcome and depositions cancelled
5/12/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mails with co-counsel re: depositions
5/13/2011	Rachel Scherer	0.20	Meeting with/re:	Kevin re: case progress, meeting opposing counsel yesterday, TRO, etc.
5/16/2011	Rachel Scherer	1.10	Call/Conference Call with/re:	weekly call with co-counsel
5/16/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	e-mails to coordinate call today
5/16/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mail from Melinda re: TRO loss and next steps

Attorney Hours 2/8/2010 - 1/31/2013

5/16/2011	Rachel Scherer	0.50	Review Documents/Records	Jessica's depo questions for Dr. Theophelov and e-mail to Jessica re: topic
5/18/2011	Rachel Scherer	1.30	Draft/Edit	supplemental declaration for Carlos Ortiz 1.2 and e-mail to co-counsel .1
5/18/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	review/respond to Matthew S.'s e-mail re: Derrick White being in the hole
5/18/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mails from Autumn, Kevin, and Melinda re: protocol for Johnson intakes to LA office
5/18/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mails from co-counsel about next steps in joint stip related to discovery
5/18/2011	Rachel Scherer	0.10	Review Correspondence/Memo	calendar discovery/filing deadlines into my hard copy calendar and accept related on-line appts
5/18/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mail from Kevin B. re: his call with opposing counsel this AM re: discovery deadlines
5/18/2011	Rachel Scherer	0.10	Review Correspondence/Memo	responses from Melinda and Kevin re: how to proceed given White is in the hole
5/18/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mail from Matthew re: site inspection ltr to Justin
5/19/2011	Rachel Scherer	0.20	Draft/Edit Correspondence/Memo	e-mail to co-counsel re: meetings with two clients today and possible next steps
5/19/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	review/respond to Melinda's e-mails re: f/u with Ortiz and White today
5/19/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	e-mail whereabouts to LA office to visit clients White and Ortiz today
5/19/2011	Rachel Scherer	0.80	Meeting with/re:	meeting with MCJ inmate D. White
5/19/2011	Rachel Scherer	0.80	Meeting with/re:	MCJ inmate C. Ortiz
5/19/2011	Rachel Scherer	0.20	Meeting with/re:	Kevin re: meetings with clients today and next steps
5/19/2011	Rachel Scherer	0.40	Other/Miscellaneous	check-in/wait to meet with inmates
5/19/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mails from co-counsel (in person meeting, response to meeting with White/Ortiz, review Kevin's review of Hill report)

Attorney Hours 2/8/2010 - 1/31/2013

5/19/2011	Rachel Scherer	1.40	Travel	to/from Men's Central Jail
5/20/2011	Rachel Scherer	0.20	Draft/Edit Correspondence/Memo	pull ADA Title II complaint form and begin to fill out for Derrick White
5/20/2011	Rachel Scherer	0.20	Draft/Edit Correspondence/Memo	review notes from meetings with Clients--White and Ortiz the other day
5/20/2011	Rachel Scherer	0.10	Meeting with/re:	Melinda re: case work on project
5/20/2011	Rachel Scherer	0.80	Meeting with/re:	Kevin and Melinda about issues in case
5/20/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mails with co-counsel
5/23/2011	Rachel Scherer	0.40	Draft/Edit	few more edits on ADA complaint for White
5/23/2011	Rachel Scherer	0.10	Draft/Edit	edit to letter to Baca (D. White)
5/23/2011	Rachel Scherer	0.30	Draft/Edit Correspondence/Memo	letter to Sheriff Baca for inmate White re: DOJ complaint .2; send to Kevin B. for review .1
5/23/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	e-mail to co-counsel with attachments and requesting discussion of D. White recourse options at today's meeting
5/23/2011	Rachel Scherer	2.00	Meeting with/re:	co-counsel to discuss strategy in light of TRO
5/23/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mails from Kevin re: edit to letter to Baca for White and review of ADA/DOJ complaint
5/23/2011	Rachel Scherer	1.80	Review Pleading/Brief	review TRO briefs in prep for meeting today to discuss strategy how to proceed in light of denial 1.2; review briefs on Motion to Compel Site Inspection .6 in prep for meeting today
5/23/2011	Rachel Scherer	1.00	Travel	to/from Winston law firm for meeting with co-counsel
5/24/2011	Rachel Scherer	0.20	Review Correspondence/Memo	notes from yesterday's meeting circulated by Jessica
5/25/2011	Rachel Scherer	0.10	Call/Conference Call with/re:	voice message to inmate Carlos Ortiz's attorney re: client's request for accommodation needs and my meeting him at court date tomorrow

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5/25/2011	Rachel Scherer	0.10	Draft/Edit	whereabouts today to office
5/25/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	e-mails to/from Jessica re: inmate declarant signatures
5/25/2011	Rachel Scherer	0.30	Draft/Edit Correspondence/Memo	e-mail to team re: meeting with White and Ortiz today and next steps
5/25/2011	Rachel Scherer	0.80	Meeting with/re:	inmate Derrick White re: grievance in solitary
5/25/2011	Rachel Scherer	0.40	Meeting with/re:	wait to meet with deputies and legal sergeant and then meet with them re: my right to obtain pink slip copies of inmate complaints--which they provided eventually
5/25/2011	Rachel Scherer	0.50	Meeting with/re:	inmate Carlos Ortiz re: complaints
5/25/2011	Rachel Scherer	0.20	Meeting with/re:	Kevin B. re: meeting with White and Ortiz today
5/25/2011	Rachel Scherer	0.10	Meeting with/re:	Kevin re: contacting client's PD
5/25/2011	Rachel Scherer	0.10	Meeting with/re:	Melinda re: White/Ortiz grievances and next steps
5/25/2011	Rachel Scherer	0.30	Other/Miscellaneous	check-in @ jail, wait to meet with clients, write outline of questions for client interviews today
5/25/2011	Rachel Scherer	0.90	Travel	to/from Men's Central Jail to meet with two inmates (Ortiz and white)
5/26/2011	Rachel Scherer	0.60	Draft/Edit Correspondence/Memo	cover letter to Beach re: White's inmate complaint
5/26/2011	Rachel Scherer	0.20	Draft/Edit Correspondence/Memo	e-mail to co-counsel re: next steps related to White and Ortiz
5/26/2011	Rachel Scherer	0.20	Draft/Edit Correspondence/Memo	e-mail client's PD a recommended PT examiner for Ortiz for possible confidential eval
5/26/2011	Rachel Scherer	0.20	Meeting with/re:	Kevin re: f/u with Ortiz tomorrow and White cover letter to Beach
5/26/2011	Rachel Scherer	0.30	Meeting with/re:	Melinda re: meeting with Carlos' PD .1; meeting with Kevin on same and getting PD contact info .2

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5/26/2011	Rachel Scherer	0.30	Meeting with/re:	Carlos Ortiz's Public Defender re: Carlos' need for independent medical Eval.
5/26/2011	Rachel Scherer	0.30	Other/Miscellaneous	wait in courtroom to meet with PD and/or client (Ortiz)
5/26/2011	Rachel Scherer	0.30	Other/Miscellaneous	check-in at courthouse, walk/to from parking area
5/26/2011	Rachel Scherer	0.20	Review Correspondence/Memo	template juv. hall letter for request to be present at grievance stages
5/26/2011	Rachel Scherer	0.10	Review Correspondence/Memo	prior letters to Beach in file
5/26/2011	Rachel Scherer	0.10	Review Correspondence/Memo	review White's inmate complaint
5/26/2011	Rachel Scherer	1.00	Travel	to/from courthouse to meet with Carlos Ortiz to obtain pink slips of grievances
5/27/2011	Rachel Scherer	0.10	Call/Conference Call with/re:	with KB re: his visit with Ortiz today re: complaint
5/27/2011	Rachel Scherer	0.30	Draft/Edit Correspondence/Memo	plug in edits to letter and e-mail Beach letter re: White complaint with attachments
5/27/2011	Rachel Scherer	0.10	Meeting with/re:	Melinda re: edits to letter re: White grievance
5/27/2011	Rachel Scherer	0.20	Review Correspondence/Memo	letter from Beach accepting mediation proposal .1; e-mails with co-counsel about response .1
5/27/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mail from Steve @ Winston re: mediation strategy
5/27/2011	Rachel Scherer	0.10	Review Correspondence/Memo	more co-counsel e-mails re: joint stip discovery and also mediation
5/27/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mails from Shawna and Ben re: mediation
5/27/2011	Rachel Scherer	0.10	Review Correspondence/Memo	review + incorporate edits to White ltr from Jessica @ ACLU
5/27/2011	Rachel Scherer	0.30	Review Pleading/Brief	joint stip re: discovery issues circulated by Matthew and related e-mails
5/31/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	e-mail to co-counsel re: dividing up review of docs

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5/31/2011	Rachel Scherer	0.20	Meeting with/re:	Kevin B. re: meeting with Ortiz last week and next steps for strategy on his case
5/31/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mails from Kevin, Matthew, Ben, and Jessica re: dividing up review of documents
5/31/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mails from Melinda and Jessica re: case strategy and mediation dates
6/1/2011	Rachel Scherer	0.10	Call/Conference Call with/re:	Kevin re: meeting tomorrow to review records in case
6/1/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	review/respond to co-counsel e-mails to set up call and re: records review at Justin's office
6/1/2011	Rachel Scherer	0.10	Other/Miscellaneous	review e-mail and litigation goals from KB--ask CG to print for me
6/1/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mails with co-counsel re: dates for mediation and possible conf. call
6/2/2011	Rachel Scherer	0.10	Call/Conference Call with/re:	f/u call with Kevin re: review of decls for him today
6/2/2011	Rachel Scherer	0.60	Draft/Edit Correspondence/Memo	e-mails to Kevin with summaries of declarations for 6 inmates to help with his record review today at Beach's office
6/2/2011	Rachel Scherer	0.40	Draft/Edit Correspondence/Memo	responsive letter to Beach and circulate to team for review
6/2/2011	Rachel Scherer	0.20	Draft/Edit Correspondence/Memo	e-mails to co-counsel re: letter received from Beach today re: White and possible next steps
6/2/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	e-mail to Kevin to coordinate meeting today
6/2/2011	Rachel Scherer	0.10	Meeting with/re:	paralegal re: letter from Beach
6/2/2011	Rachel Scherer	0.20	Review Correspondence/Memo	letter from Beach re: White inmate complaint
6/2/2011	Rachel Scherer	0.60	Review Documents/Records	declarations for Kevin (6 inmates related to records he is reviewing today)
6/3/2011	Rachel Scherer	0.10	Call/Conference Call with/re:	Kevin re: inmate orientation handbook and medical evaluation request
6/3/2011	Rachel Scherer	0.20	Draft/Edit Correspondence/Memo	e-mails and calls with Kevin re: possible right to request independent medical exam in jail at cost of inmate

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6/3/2011	Rachel Scherer	0.20	Draft/Edit Correspondence/Memo	e-mails with Jessica and team re: response to Beach re: ltr
6/3/2011	Rachel Scherer	0.20	Meeting with/re:	Kevin re: meet and confer yesterday, and response to Beach, and general case direction
6/3/2011	Rachel Scherer	0.10	Review Correspondence/Memo	review/respond to Kevin's e-mail re: QA issue for discovery
6/3/2011	Rachel Scherer	0.10	Review Correspondence/Memo	Matthew's response re: QA discovery issues
6/3/2011	Rachel Scherer	0.10	Review Correspondence/Memo	review/print edits to case plan from Jessica @ ACLU
6/3/2011	Rachel Scherer	0.10	Review Correspondence/Memo	review/respond to KB e-mails re: call with Dr. Hill re: QA records issue
6/6/2011	Rachel Scherer	0.20	Call/Conference Call with/re:	KB re: Johnson call f/u
6/6/2011	Rachel Scherer	0.60	Call/Conference Call with/re:	call with co-counsel
6/6/2011	Rachel Scherer	0.30	Draft/Edit Correspondence/Memo	notes from today's Johnson call and circulate to co-counsel
6/6/2011	Rachel Scherer	0.20	Review Correspondence/Memo	correspondence with Beach re: White grievance in prep for call
6/6/2011	Rachel Scherer	0.10	Review Correspondence/Memo	Melinda's draft ltr to Beach re: mediation
6/7/2011	Rachel Scherer	0.10	Call/Conference Call with/re:	Kevin B. re: depo transcript signed and update re client visits today
6/7/2011	Rachel Scherer	0.60	Meeting with/re:	Joe Gonzalez re: deposition transcript and how things are in jail
6/7/2011	Rachel Scherer	0.20	Meeting with/re:	jail staff re: status/whereabouts of other two inmates I want to meet with today (White + Ortiz)
6/7/2011	Rachel Scherer	0.60	Meeting with/re:	Ortiz re: how he is in jail/grievance status .5; meeting with deputy re: how to get Ortiz complaint/grievance .1
6/7/2011	Rachel Scherer	0.20	Meeting with/re:	f/u meeting with Joe after he reviewed deposition transcript that it was accurate and he signed
6/7/2011	Rachel Scherer	0.10	Meeting with/re:	deputies that White is not available for meeting today b/c at court

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6/7/2011	Rachel Scherer	0.10	Meeting with/re:	Matthew S. and other inmate for this case (new) at jail
6/7/2011	Rachel Scherer	0.10	Other/Miscellaneous	check-in procedures to meet with 3 inmates
6/7/2011	Rachel Scherer	0.40	Other/Miscellaneous	wait to meet with inmates at jail--during this time I read the depo transcript for Joe Gonzalez
6/7/2011	Rachel Scherer	0.60	Review	review more of Joe Gonzalez's depo transcript (while he was also reviewing another copy) while also waiting to meet with other inmates (White/Ortiz)
6/7/2011	Rachel Scherer	0.50	Travel	to jail from office
6/7/2011	Rachel Scherer	0.40	Travel	from jail back to home (but minus normal travel time to/from work)
6/8/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	review/respond to e-mails from KB and others re: settlement goals meeting next week
6/8/2011	Rachel Scherer	0.10	Review Correspondence/Memo	stip e-mails from Kevin and Matthew
6/10/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mails from co-counsel re: meeting with clients
6/13/2011	Rachel Scherer	0.30	Call/Conference Call with/re:	call with co-counsel
6/13/2011	Rachel Scherer	0.50	Draft/Edit Correspondence/Memo	response letter to Beach based on last Mon. co-counsel call and re-circulate to team
6/13/2011	Rachel Scherer	0.30	Review Correspondence/Memo	letters from inmates to Jessica at ACLU in prep for call today with co-counsel
6/15/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	e-mails with co-counsel re: scheduling settlement planning meeting
6/16/2011	Rachel Scherer	0.10	Call/Conference Call with/re:	Kevin re: Beach letter
6/16/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	e-mail to co-counsel ltr sent to Beach today re: White grievance
6/16/2011	Rachel Scherer	0.50	Draft/Edit Correspondence/Memo	edits to Beach letter .2; review TRO and ltr from Beach .3

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6/16/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	e-mails to/from KB re: edits to Beach letter
6/16/2011	Rachel Scherer	0.20	Draft/Edit Correspondence/Memo	final edits to Beach letter, scan, and e-mail to Beach
6/16/2011	Rachel Scherer	0.10	Meeting with/re:	Melinda and Kevin re: letter to Beach in response to my June 1, 2011 letter
6/16/2011	Rachel Scherer	0.20	Meeting with/re:	Melinda re: letter to Beach and edits/call with KB on same
6/16/2011	Rachel Scherer	0.20	Review Correspondence/Memo	letter from inmate Carlos Ortiz and meeting with MB on topic
6/16/2011	Rachel Scherer	0.10	Review Correspondence/Memo	edits from MB to Beach letter
6/16/2011	Rachel Scherer	0.10	Review Documents/Records	review Ella's summary review of White medical records
6/17/2011	Rachel Scherer	2.00	Meeting with/re:	co-counsel at DRLC (in person) re: settlement
6/17/2011	Rachel Scherer	0.20	Review Correspondence/Memo	review Johnson settlement outline from KB
6/17/2011	Rachel Scherer	1.00	Travel	to/from DRLC for in person meeting
7/6/2011	Rachel Scherer	0.10	Meeting with/re:	meeting with KB re: updates in case
7/6/2011	Rachel Scherer	1.70	Meeting with/re:	Kevin, Melinda, and Ella to prep re: motion for partial summary judgment and related tasks
7/6/2011	Rachel Scherer	0.20	Review Correspondence/Memo	notes from call with co-counsel circulated by Kevin B.
7/6/2011	Rachel Scherer	0.20	Review Correspondence/Memo	e-mails from Jessica P. and Kevin B. re: inmate to have Beach/jail check in on
7/7/2011	Rachel Scherer	0.20	Meeting with/re:	Kevin B. re: uncontroverted facts needed for segregation issue for MPSJ
7/7/2011	Rachel Scherer	0.20	Review Correspondence/Memo	e-mails from co-counsel and response as well
7/7/2011	Rachel Scherer	0.20	Review Correspondence/Memo	materials from Melinda from yesterday's meeting re: uncontroverted facts and next steps for MPSJ

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7/8/2011	Rachel Scherer	0.20	Meeting with/re:	Kevin re: scheduling meeting with SF firms next week re: Armstrong case and jail strategies
7/8/2011	Rachel Scherer	0.20	Meeting with/re:	Kevin B. re: materials to review for meeting with SF law firms on jail case strategy next week
7/8/2011	Rachel Scherer	0.30	Review Correspondence/Memo	e-mails from co-counsel while I was out on vacation re: Alexander White, notes from calls, etc.
7/12/2011	Rachel Scherer	1.20	Meeting with/re:	Rosen, Bien, Galvin re Armstrong and related issues in Johnson
7/12/2011	Rachel Scherer	1.40	Travel	From Oakland to SF for mtg w Rosen, Bien, Galvin re Armstrong case, during which time I read Armstrong recent opinion and remedial plan
7/12/2011	Rachel Scherer	2.00	Travel	Walking to Bart, Bart to airport, to La by plane. Travel return time shared equally with Fresno project since also met w co-counsel while there
7/13/2011	Rachel Scherer	0.10	Call/Conference Call with/re:	Kevin re: Justin's e-mail and depo dates/scheduling
7/13/2011	Rachel Scherer	0.50	Call/Conference Call with/re:	Kevin and Melinda re: debrief re: meeting with Rosen, Bien, and Galvin yesterday
7/13/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	update workplan with action items
7/13/2011	Rachel Scherer	0.10	Meeting with/re:	Kevin re: depo on Monday and prep for this
7/13/2011	Rachel Scherer	0.10	Review Correspondence/Memo	Kevin's e-mail re: notice from Justin re: depo dates and how to respond
7/13/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mail and chart from Ella re: review of evidence re: incidents of discrimination/depo questions
7/14/2011	Rachel Scherer	0.20	Call/Conference Call with/re:	Kevin B. re: questions to prepare for classification deposition on Monday
7/14/2011	Rachel Scherer	0.30	Call/Conference Call with/re:	Kevin re: first round of depo questions .2; Kevin re: second round of depo questions sent for his review
7/14/2011	Rachel Scherer	0.30	Draft/Edit	begin drafting classification questions for Monday's depo
7/14/2011	Rachel Scherer	1.00	Draft/Edit	draft questions for Monday's depo .9; e-mail to Kevin with attachment and cover e-mail .1

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7/14/2011	Rachel Scherer	1.50	Draft/Edit	review Hopper 2011 accessibility report and draft chart of evidence and possible questions
7/14/2011	Rachel Scherer	0.30	Legal Research	new 2011 jail regs on segregation/integration in housing
7/14/2011	Rachel Scherer	0.50	Review	Hopper report for language to prep for depositions
7/14/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mail from co-counsel re: JAMS fee agreement
7/14/2011	Rachel Scherer	0.10	Review Correspondence/Memo	Hill report
7/15/2011	Rachel Scherer	0.10	Call/Conference Call with/re:	Kevin B. re: review of decls and prep of chart for depo questions
7/15/2011	Rachel Scherer	0.10	Call/Conference Call with/re:	Kevin re: depo/evidence questions prep for Monday
7/15/2011	Rachel Scherer	0.10	Call/Conference Call with/re:	Kevin re: review of declarations in prep for depo
7/15/2011	Rachel Scherer	3.00	Draft/Edit	review numerous client declarations and in doing so draft a chart with key facts and proposed depo questions in prep for Monday's depo with Kevin
7/15/2011	Rachel Scherer	0.20	Meeting with/re:	Kevin re: depo evidence/questions research
7/15/2011	Rachel Scherer	0.30	Meeting with/re:	Kevin and Melinda re: rewriting some depo questions and goals for Monday's depo
7/15/2011	Rachel Scherer	0.20	Review Correspondence/Memo	draft depo questions from Kevin B.
7/15/2011	Rachel Scherer	0.10	Review Correspondence/Memo	Hill report in prep for Monday depo
7/15/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mail from KB to Rosen, Bien, & Galvan re: f/u on our meeting earlier in the week
7/15/2011	Rachel Scherer	0.50	Review Documents/Records	Compendium of Evidence records to prep for depo Monday w/ KB
7/17/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	Email Kevin revisions to depo questions

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7/17/2011	Rachel Scherer	0.40	Review Correspondence/Memo	Draft questions for depo tomorrow from KB
7/18/2011	Rachel Scherer	0.10	Call/Conference Call with/re:	KB re: Steve Smith research/Coleman
7/18/2011	Rachel Scherer	0.10	Call/Conference Call with/re:	Kelly Kn. re: Steve Smith/Coleman transcript
7/18/2011	Rachel Scherer	0.10	Call/Conference Call with/re:	Jane K. at Rosen, Bien, and Galvan re: Steve Smith/Coleman
7/18/2011	Rachel Scherer	0.10	Call/Conference Call with/re:	KB re: gathering more info about Steve Smith in order to call other firms for help finding transcript
7/18/2011	Rachel Scherer	2.40	Deposition	Depo of Lieutenant Connor at DRC with Kevin B., and opposing counsel
7/18/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	e-mails with Rosen, Bien, and Galvan re: Coleman/Steve Smith transcript
7/18/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	e-mails to KB re: Steve Smith transcripts
7/18/2011	Rachel Scherer	0.10	Meeting with/re:	meeting KB and MB re: depo schedule and Coleman transcript (Steve Smith)
7/18/2011	Rachel Scherer	0.10	Meeting with/re:	MB f/u re: Steve Smith/Coleman transcript research
7/18/2011	Rachel Scherer	0.10	Meeting with/re:	KB re: Steve Smith transcript
7/18/2011	Rachel Scherer	0.50	Review	outline and materials in prep for depo
7/18/2011	Rachel Scherer	0.10	Review Documents/Records	Steve Smith transcript from Coleman case
7/19/2011	Rachel Scherer	0.10	Meeting with/re:	Melinda re: assignments and upcoming MSJ
7/20/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	review/respond to e-mail from Blake at R,B,G re: Armstrong documents he sent
7/25/2011	Rachel Scherer	0.30	Call/Conference Call with/re:	call with co-counsel
7/25/2011	Rachel Scherer	0.20	Meeting with/re:	check-in meeting with Kevin re: upcoming depos and work on case

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7/26/2011	Rachel Scherer	4.00	Deposition	deposition with Kevin B. and ACLU clerk of Terry Martin 2hrs AM; deposition with Kevin B. and ACLU clerk of David Brossoit 2hrs PM
7/27/2011	Rachel Scherer	0.20	Meeting with/re:	Kevin about upcoming depositions in case
7/28/2011	Rachel Scherer	0.10	Call/Conference Call with/re:	Melinda B. re: upcoming depositions and scheduling
7/28/2011	Rachel Scherer	0.10	Call/Conference Call with/re:	Kevin B. re: upcoming deposition dates
7/28/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	review workplan and draft action items/plan for next 3 weeks
7/31/2011	Rachel Scherer	0.20	Review Correspondence/Memo	review e-mails from co-counsel re: MSJ task list, depositions, meet and confer letter
8/3/2011	Rachel Scherer	0.20	Meeting with/re:	KB/MB re: outline MSJ
8/3/2011	Rachel Scherer	0.10	Meeting with/re:	Kevin re: deposition today and general coordination on MSJ
8/3/2011	Rachel Scherer	0.20	Review Correspondence/Memo	e-mails from KB re: transportation docs, deposition scheduling, meet and confer letter (MSJ), and questions for training deposition
8/4/2011	Rachel Scherer	2.50	Meeting with/re:	Kevin and Melinda re: tasks and research for motion for summary judgment
8/4/2011	Rachel Scherer	1.00	Review Pleading/Brief	draft motion for summary judgment in prep for meeting with Kevin and Melinda
8/6/2011	Rachel Scherer	1.10	Draft/Edit Correspondence/Memo	quotes from Gibbens and Hopper 2010 report 1; e-mail to MB and KB summarizing .1
8/6/2011	Rachel Scherer	1.00	Review Documents/Records	Gibbens expert report (D's expert)
8/6/2011	Rachel Scherer	1.20	Review Documents/Records	Hopper 2010 expert report (P's expert)
8/6/2011	Rachel Scherer	0.40	Review Documents/Records	first half of Hopper 2008 report
8/7/2011	Rachel Scherer	0.20	Call/Conference Call with/re:	Kevin B. re: updates in case work .1; Melinda re: same .1
8/7/2011	Rachel Scherer	0.50	Draft/Edit Correspondence/Memo	greatest hits Hopper 2008 report .4; review respond to MB e-mails .1

8/7/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	e-mails about setting up conf. call this AM KB, MB, RS
8/7/2011	Rachel Scherer	0.60	Draft/Edit Correspondence/Memo	Conner depo summary .5 and then e-mail to MB and KB .1
8/7/2011	Rachel Scherer	0.10	Review Correspondence/Memo	MB depo question list
8/7/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mail from KB re: depo questions and also 1992 housing legal issues
8/7/2011	Rachel Scherer	0.40	Review Documents/Records	second half of Hopper 2008 report
8/7/2011	Rachel Scherer	1.50	Review Documents/Records	Conner depo transcript to create summary
8/8/2011	Rachel Scherer	1.10	Call/Conference Call with/re:	call with co-counsel (Jessica, Shawna, Kevin, Melinda)
8/8/2011	Rachel Scherer	0.10	Meeting with/re:	Melinda B. re: work to do
8/8/2011	Rachel Scherer	1.00	Meeting with/re:	KB, MB, and paralegal re: action items for MSJ
8/8/2011	Rachel Scherer	0.20	Review Pleading/Brief	new MSJ in prep for call with co-counsel today
8/9/2011	Rachel Scherer	0.30	Call/Conference Call with/re:	Men's Central Jail to discuss access for paralegal at A-C Visiting room: 1) call with watch commander .1; 2) call with legal staff general .1; and 3) call with Sergeant Lavey re: access authority
8/9/2011	Rachel Scherer	0.30	Draft/Edit Correspondence/Memo	letter to Sergeant Lavey re: access authority for paralegal to interview at MCJ A-C visiting room
8/9/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	e-mail from Kevin re: ADA link on Sheriff's web-site
8/9/2011	Rachel Scherer	0.20	Legal Research	review physical access authority law and print to fax to Lavey
8/9/2011	Rachel Scherer	0.30	Legal Research	summary judgment qualifications for experts
8/9/2011	Rachel Scherer	0.80	Meeting with/re:	KB and MB re: depo prep for Cruz today

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8/9/2011	Rachel Scherer	0.10	Meeting with/re:	Kevin re: Cruz depo cancelation for today
8/9/2011	Rachel Scherer	1.50	Meeting with/re:	Kevin and Melinda to prep for depo tomorrow (Burns)
8/9/2011	Rachel Scherer	0.20	Review Correspondence/Memo	Burns depo prep questions
8/10/2011	Rachel Scherer	3.00	Deposition	Depo of Burns (with Kevin and Melinda)
8/10/2011	Rachel Scherer	0.10	Meeting with/re:	Melinda B. re: debrief re: Burns depo
8/10/2011	Rachel Scherer	1.00	Other/Miscellaneous	Meeting with Kevin and Melinda to prep for Cruz depo
8/10/2011	Rachel Scherer	0.40	Review Documents/Records	Hill report in prep for Burns depo to determine if Hill references anyone having to stand for the count
8/11/2011	Rachel Scherer	0.10	Call/Conference Call with/re:	voice message from Sergeant Lavey re: paralegal access to A-C room
8/11/2011	Rachel Scherer	0.20	Call/Conference Call with/re:	call with Sergeant Lavey to clarify paralegal access to A-C room
8/11/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	e-mails to/from paralegal, Melinda, and Kevin re: procedures for paralegal to visit A-C room at MCJ
8/11/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	action items for project
8/11/2011	Rachel Scherer	0.80	Meeting with/re:	meet and confer with Kevin and Justin C. re: MSJ
8/11/2011	Rachel Scherer	0.10	Meeting with/re:	Kevin B. re: meet and confer today with Justin
8/11/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mails from co-counsel re: meet and confer (Steven and Kevin's summary)
8/11/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mails from co-counsel--UCLA article/seg., and Burns depo summary from MB
8/12/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	e-mails from co-counsel re: decls
8/12/2011	Rachel Scherer	0.50	Meeting with/re:	MB and KB about case strategy, Zasorin Depo, MSJ, meet and confer, and MSJ

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8/12/2011	Rachel Scherer	0.20	Meeting with/re:	.1 Kevin about Kwan decl and Zasorin Depo; .1 paralegal re: copying Kwan decl
8/12/2011	Rachel Scherer	0.10	Prepare	docs to take home to review Zasorin depo this weekend
8/14/2011	Rachel Scherer	1.10	Review	review Zasorin depo 6/29/11 by Kevin B.
8/14/2011	Rachel Scherer	2.60	Review	review Theophilov depo by Jessica P. 6/29/11
8/14/2011	Rachel Scherer	2.20	Review	review Kwan depo by Kevin B. 02/11
8/15/2011	Rachel Scherer	0.10	Call/Conference Call with/re:	Kevin B. re: Zasorin Decl. cancelled
8/15/2011	Rachel Scherer	0.10	Call/Conference Call with/re:	co-counsel re: weekly call
8/15/2011	Rachel Scherer	1.50	Draft/Edit	deposition questions for Dr. Zasorin
8/15/2011	Rachel Scherer	0.50	Draft/Edit	finalize depo outline questions for Zasorin
8/15/2011	Rachel Scherer	0.20	Draft/Edit Correspondence/Memo	letter to MCJ re: access for paralegal to interview clients
8/15/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	e-mail Kevin Zasorin outline/depo questions
8/15/2011	Rachel Scherer	0.10	Meeting with/re:	Kevin B. re: depo prep and meeting later today
8/15/2011	Rachel Scherer	0.10	Meeting with/re:	Kevin B. about finalizing Zasorin depo outline even though it is now cancelled
8/15/2011	Rachel Scherer	0.10	Meeting with/re:	paralegal re: letter for access to jail and procedures to get into jail
8/15/2011	Rachel Scherer	0.60	Review	draft Motion for Summary Judgment to prepare for depo for Zasorin tomorrow
8/15/2011	Rachel Scherer	0.70	Review	list of uncontroverted facts in prep for depo with Zasorin tomorrow
8/15/2011	Rachel Scherer	0.30	Review	Zasorin declaration filed with opposition. to TRO

Attorney Hours 2/8/2010 - 1/31/2013

8/15/2011	Rachel Scherer	0.10	Review	outline of depo questions for Zasorin prepared for 06/29/11 depo by Kevin B.
8/15/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mail from KB to co-counsel re: strategy given Zasorin might not be available for deposition
8/16/2011	Rachel Scherer	0.10	Meeting with/re:	Kevin B. re: PATBI funding in this case and call with Debra M.
8/17/2011	Rachel Scherer	3.50	Deposition	deposition of Captain Cruz with Kevin B. 3.3; .2 prep
8/17/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	e-mail response to paralegal/group re: next steps re: her meeting with client yesterday
8/17/2011	Rachel Scherer	0.10	Review Correspondence/Memo	memo from paralegal re: meeting with inmate at jail yesterday
8/17/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mails from KB and Jessica re: new decls and also building permit research
8/18/2011	Rachel Scherer	0.10	Call/Conference Call with/re:	Carolina from Rosen Bien and Galvan re: Armstrong documents
8/18/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	e-mails to/from Armstrong counsel re: briefs/pleadings in case
8/18/2011	Rachel Scherer	0.20	Meeting with/re:	Kevin B. re: case assignments
8/22/2011	Rachel Scherer	0.40	Call/Conference Call with/re:	weekly call with co-counsel
8/22/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mails from co-counsel re: mediation brief and MSJ
8/25/2011	Rachel Scherer	0.20	Meeting with/re:	Kevin B. re: depo schedule, MSJ, and mediation brief
8/25/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mails from co-counsel re: mediation brief drafts and decls
8/29/2011	Rachel Scherer	0.10	Call/Conference Call with/re:	coordination with MB and KB re: Smith depo today
8/29/2011	Rachel Scherer	2.00	Deposition	AM depo with Captain Smith (KB & MB)
8/29/2011	Rachel Scherer	3.20	Deposition	PM depo of Captain Smith

Attorney Hours 2/8/2010 - 1/31/2013

8/30/2011	Rachel Scherer	0.10	Call/Conference Call with/re:	Kevin B. re: medication/MH research
8/30/2011	Rachel Scherer	1.10	Legal Research	standing research in class action for purposes of MSJ
8/30/2011	Rachel Scherer	0.20	Legal Research	pull current definition of ADA for research assignment to KB and MB
8/30/2011	Rachel Scherer	0.90	Legal Research	legal research medications alone not adequate MH treatment in jail .8; e-mail K. Knapp .1
8/30/2011	Rachel Scherer	0.10	Meeting with/re:	Kevin re: Johnson coordination meeting re: research tasks
8/31/2011	Rachel Scherer	0.90	Call/Conference Call with/re:	Call w MB and KB re research for mediation and motion for SJ
8/31/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mails from co-counsel re: addendum to mediation brief
8/31/2011	Rachel Scherer	0.10	Review Correspondence/Memo	Notes in prep for call w KB and MB
9/1/2011	Rachel Scherer	1.60	Deposition	AM portion of depo with KB and Lieutenant Ryan
9/1/2011	Rachel Scherer	1.70	Deposition	second half of deposition with Sergeant Ryan
9/1/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	circulate depo notes to internal co-counsel
9/1/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mail from Kevin re: Ryan depo
9/2/2011	Rachel Scherer	0.10	Legal Research	KB re: next meeting in case and outstanding research
9/2/2011	Rachel Scherer	0.10	Prepare	prepare materials to take home for weekend to work from home
9/4/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	action items in case
9/4/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	e-mail to MB and KB with MSJ brief
9/4/2011	Rachel Scherer	1.00	Draft/Edit Pleading/Brief	edit MSJ--intro and add language/cites to brief

Attorney Hours 2/8/2010 - 1/31/2013

9/4/2011	Rachel Scherer	0.90	Legal Research	review laws and Boston treatise in order to draft edits into MSJ brief
9/6/2011	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	action items
9/6/2011	Rachel Scherer	0.10	Meeting with/re:	Kevin re: MSJ brief and schedule to work on brief
9/6/2011	Rachel Scherer	0.10	Meeting with/re:	paralegal re: MSJ draft in accessible form
9/7/2011	Rachel Scherer	0.30	Draft/Edit Correspondence/Memo	add in new edits to MSJ brief re: medication alone not only form of treatment
9/7/2011	Rachel Scherer	0.30	Draft/Edit Pleading/Brief	update edits to MSJ brief and circulate to KB and MB
9/7/2011	Rachel Scherer	1.00	Legal Research	case law re: medication alone not only form of MH treatment & duty to protect from harm
9/12/2011	Rachel Scherer	1.00	Call/Conference Call with/re:	weekly conference call with co-counsel--mediation, discovery, MSJ
9/12/2011	Rachel Scherer	0.10	Meeting with/re:	Kevin re: MSJ timeline
9/13/2011	Rachel Scherer	0.10	Draft/Edit	e-mail ADA definition of disability to co-counsel
9/13/2011	Rachel Scherer	0.20	Legal Research	review definition of disability under ADA
9/15/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mails from KB re: MSJ and discovery issues
9/16/2011	Rachel Scherer	0.10	Meeting with/re:	KB re: MSJ and tasks to complete
9/16/2011	Rachel Scherer	0.10	Meeting with/re:	Kevin B. re: MSJ draft
9/16/2011	Rachel Scherer	0.20	Review Correspondence/Memo	ltr to counsel re: discovery dispute--and meeting with KB re: edits
9/17/2011	Rachel Scherer	0.50	Review Pleading/Brief	Review MSJ brief
9/19/2011	Rachel Scherer	0.20	Meeting with/re:	MB re: Motion for Summary Judgment and next steps

Attorney Hours 2/8/2010 - 1/31/2013

9/21/2011	Rachel Scherer	0.20	Meeting with/re:	Kevin B. re: my thoughts on MSJ and next steps for moving forward
9/21/2011	Rachel Scherer	0.10	Review Correspondence/Memo	review e-mails from KB and MB re: mediation fees, and statement of uncontroverted facts
9/22/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mails from co-counsel re: mediation
9/26/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mails from co-counsel re: initial disclosures and class member names
9/27/2011	Rachel Scherer	0.10	Meeting with/re:	e-mails re: fees issue and new declarations
9/28/2011	Rachel Scherer	0.20	Other/Miscellaneous	meeting with Kevin and Melinda re: mediation today
10/3/2011	Rachel Scherer	0.10	Review Correspondence/Memo	notes from call today
10/10/2011	Rachel Scherer	0.10	Call/Conference Call with/re:	Jessica at ACLU re: media interview for Johnson upcoming
10/10/2011	Rachel Scherer	0.10	Other/Miscellaneous	review e-mails from co-counsel
10/18/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mail from KB re: Tevrizian appt
10/31/2011	Rachel Scherer	0.10	Review Correspondence/Memo	e-mails from Jessica re: class cert and Kevin re: discovery dispute
1/20/2012	Rachel Scherer	0.20	Meeting with/re:	KB re: case
2/3/2012	Rachel Scherer	0.10	Meeting with/re:	KB re: case
3/2/2012	Rachel Scherer	1.30	Meeting with/re:	meeting with MB, KB, and AE re: motion for summary judgment
3/5/2012	Rachel Scherer	0.20	Call/Conference Call with/re:	calls with KB throughout the day on variety of issues related to citations for MSJ
3/5/2012	Rachel Scherer	0.60	Draft/Edit Correspondence/Memo	update new electronic uncontroverted fact chart from KB with my handwritten cites on Alexander decl.
3/5/2012	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	e-mails to/from co-counsel re: additional client decls for cites into MSJ

Attorney Hours 2/8/2010 - 1/31/2013

3/5/2012	Rachel Scherer	0.30	Meeting with/re:	KB and AB re: facts/cites for MSJ
3/5/2012	Rachel Scherer	1.10	Review	AM review and pull cites in Alexander decl May 2011 and plug into chart
3/5/2012	Rachel Scherer	0.10	Review Correspondence/Memo	e-mails from MB and KB coordinating on MSJ
3/5/2012	Rachel Scherer	0.20	Review Correspondence/Memo	collective case file docs in U drive to pull decls to get cites for MSJ
3/5/2012	Rachel Scherer	1.00	Review Correspondence/Memo	new MSJ uncontroverted facts chart
3/5/2012	Rachel Scherer	2.00	Review Correspondence/Memo	finalize Alexander decl cites into MSJ uncontroverted fact chart and begin plugging in decl cites from White decl.
3/6/2012	Rachel Scherer	0.10	Call/Conference Call with/re:	law clerk KD re: working on this during the afternoon
3/6/2012	Rachel Scherer	0.20	Call/Conference Call with/re:	PM call with law clerk KD re: assignment re: pulling citations for chart based on decl review
3/6/2012	Rachel Scherer	0.10	Call/Conference Call with/re:	paralegal re: coordinating edits re: chart
3/6/2012	Rachel Scherer	0.10	Call/Conference Call with/re:	paralegal re: formatting of excel/word doc
3/6/2012	Rachel Scherer	0.10	Call/Conference Call with/re:	KB re: additional track changes into uncontroverted facts
3/6/2012	Rachel Scherer	0.10	Call/Conference Call with/re:	PM call with KB re: MSJ chart
3/6/2012	Rachel Scherer	3.20	Draft/Edit Correspondence/Memo	continue drafting fact/client decl. citations into MSJ chart
3/6/2012	Rachel Scherer	2.50	Draft/Edit Correspondence/Memo	continue adding fact cites into MSJ chart 2.3; e-mail to KB summarizing results .2
3/6/2012	Rachel Scherer	0.10	Meeting with/re:	KB and AB re: pulling cites for MSJ and problems with excel in track changes
3/6/2012	Rachel Scherer	0.10	Meeting with/re:	KB re: decl cites for MSJ chart
3/7/2012	Rachel Scherer	0.10	Call/Conference Call with/re:	Kevin re: MSJ chart edits

Attorney Hours 2/8/2010 - 1/31/2013

3/7/2012	Rachel Scherer	0.10	Call/Conference Call with/re:	KB re: new assignment to review class plaintiff decls
3/7/2012	Rachel Scherer	0.10	Call/Conference Call with/re:	KB re: coordination on edits for class rep doc review and how to track based on latest version of draft
3/7/2012	Rachel Scherer	1.60	Draft/Edit Correspondence/Memo	add more fact cites from client decls into MSJ statement of uncontroverted facts/chart 1.3; review cites from law clerk KD .2; e-mail team with updated chart
3/7/2012	Rachel Scherer	0.10	Draft/Edit Correspondence/Memo	e-mail to Winston re: new signed decls
3/7/2012	Rachel Scherer	1.00	Draft/Edit Correspondence/Memo	add cites to MSJ chart (uncontroverted facts) for Butler/Cushman decls
3/7/2012	Rachel Scherer	2.40	Draft/Edit Correspondence/Memo	edit MSJ chart (uncontroverted facts) with cites from class rep decls 2.3; e-mails with team re: same .1
3/8/2012	Rachel Scherer	0.20	Meeting with/re:	.1 meeting with KB re: assignments; .1 meeting with MB re: assignments
3/8/2012	Rachel Scherer	0.40	Review Correspondence/Memo	.2 e-mails and comments from MB to MSJ SUF; .2 e-mails from MU at DRLC on same
3/9/2012	Rachel Scherer	0.10	Call/Conference Call with/re:	KB re: review of med records
3/9/2012	Rachel Scherer	0.50	Draft/Edit Correspondence/Memo	memo for Johnson re: review MH records
3/9/2012	Rachel Scherer	0.30	Meeting with/re:	KB and AB re: records review/MH issues
3/9/2012	Rachel Scherer	0.10	Meeting with/re:	KB re: update on MH records
3/9/2012	Rachel Scherer	0.10	Review Correspondence/Memo	e-mail from KB re: assignments in Johnson re: MH
3/9/2012	Rachel Scherer	2.80	Review Documents/Records	review mental health records for Johnson
3/12/2012	Rachel Scherer	0.10	Call/Conference Call with/re:	KB re: review of Washington's records
3/12/2012	Rachel Scherer	0.20	Draft/Edit Correspondence/Memo	cover e-mail and attachment to KB re: summary of MH records for 7 clients

Attorney Hours 2/8/2010 - 1/31/2013

3/12/2012	Rachel Scherer	1.50	Review Documents/Records	review Washington's (putative class member) records
3/13/2012	Rachel Scherer	0.10	Meeting with/re:	AB re: MH records review
3/15/2012	Rachel Scherer	0.10	Review Correspondence/Memo	memo from AB re: review of MH records
3/15/2012	Rachel Scherer	0.10	Review Correspondence/Memo	e-mail from Jason with new decl. and print
	Rachel Scherer Total	206.70		
6/25/2010	Sepedeh Tofigh	6.40	Other/Miscellaneous	read materials, research and print documents.
6/28/2010	Sepedeh Tofigh	6.80	Other/Miscellaneous	read materials, research and print documents.
6/29/2010	Sepedeh Tofigh	6.40	Other/Miscellaneous	read materials, research and print documents. Write memo to Melinda about research.
6/30/2010	Sepedeh Tofigh	4.20	Other/Miscellaneous	read materials, research and print documents. Write memo to Melinda about research. view CD on session about ada in prisons.
7/1/2010	Sepedeh Tofigh	5.80	Other/Miscellaneous	read materials, research and print documents.
7/2/2010	Sepedeh Tofigh	5.90	Other/Miscellaneous	read materials, research, travel time to/from MCJ. Visit with named clients at MCJ.
7/6/2010	Sepedeh Tofigh	3.90	Other/Miscellaneous	read materials, research, write and edit memo to Melinda, Kevin and Rachel
7/7/2010	Sepedeh Tofigh	6.80	Other/Miscellaneous	read materials, research
7/8/2010	Sepedeh Tofigh	2.00	Other/Miscellaneous	read materials, research,
7/23/2010	Sepedeh Tofigh	3.60	Other/Miscellaneous	read cases and write a memo.
7/26/2010	Sepedeh Tofigh	4.00	Other/Miscellaneous	write memo on cases, research
7/27/2010	Sepedeh Tofigh	5.00	Other/Miscellaneous	write memo, do research.

Johnson v. LASD

Attorney Hours 2/8/2010 - 1/31/2013

	Sepedeh Tofigh Total	60.80		
	Grand Total	2275.50		

JOHNSON v. LASD
#4587
DRC Attorney Hours
2/1/2013 through 7/31/2014

Date	Attorney	Hours	Description
12/17/2013	Candis Watson	0.7	Tel conf with litigation team re settlement status.
1/7/2014	Candis Watson	0.5	Tel confernece re status of case.
3/5/2014	Candis Watson	0.7	Status update call.
3/10/2014	Candis Watson	0.1	Settlement negotiation dicussion re meeting with county counsel re policy changes.
3/26/2014	Candis Watson	0.1	Send email to litigation team re response to callers.
5/27/2014	Candis Watson	0.2	Check in with DOI re status.
	Candis Watson Total	2.3	
5/7/2013	Dara Schur	2.1	review proposed City stay agreement and memo comparing to term sheet and our proposals; emails re same; tc co-counsel stay and settlement negotiatons and discoverynext steps
8/19/2013	Dara Schur	0.3	tc MB re settlement negotiations and position on fees and costs.
12/10/2013	Dara Schur	0.3	tcs/emails re coverage of next call
	Dara Schur Total	2.7	
2/8/2013	Kevin Bayley	0.8	review of mediation notes re: ADA contacts for facilities, e-mails with Jessica Price re: current people performing those duties & her letter to potential class members.
	Kevin Bayley Total	0.8	
2/1/2013	Melinda Bird	1.3	conf with co-counsel P Eliasberg re settlement strategy, delays from county, .4; review materials from PE, .4; conf with M Uzeta re same, .5
2/1/2013	Melinda Bird	1.3	conf with co-counsel P Eliasberg re settlement strategy, delays from county, .4; review materials from PE, .4; conf with M Uzeta re same, .5
2/4/2013	Melinda Bird	1.3	prepare for meeting with opposing counsel, .4; research and locate old client complaints, declarations, .6; arrange to update binders to review, .3
2/11/2013	Melinda Bird	0.1	confirm meeting with clark, .1

JOHNSON, LASD
#4588
DRC Attorney Hours
2/1/2013 through 7/31/2014

2/14/2013	Melinda Bird	2.7	conf call with J Clark, M. Uzeta re settlement options, .7; arrange call with Dr Hill, .2; call with Hill re consulting on case, .9; draft memo to co-counsel re outcome of call, .3; conf with LD re preparing expert agreement, forward info to same, .3; draft and send follow-up memo to Hill re consultation, .3
2/21/2013	Melinda Bird	0.2	review and forward email from expert re dates, .1; respond to Michelle uzeta re getting commitment from county, .1
2/26/2013	Melinda Bird	0.1	conf with LD re fee chart, expert letter, .1
2/27/2013	Melinda Bird	0.2	follow-up with expert re april dates for inspection,.1; arrange letter of agreement, .1
2/28/2013	Melinda Bird	0.8	conf call with J Clark, .5; conf with M Uzeta re expert inspection, arrangements, .3
3/1/2013	Melinda Bird	0.6	memo to co-counsel re schedulign expert visit, .2; review answers and respond, .4
3/4/2013	Melinda Bird	1.4	conf call with co-counsel re legal strategy, plan for expert inspection, records, .8; draft memo to Dr Hill with list of prisoners, plan for inspection, .6
3/5/2013	Melinda Bird	1	tel conf with Dr Hill re inspection of LA jail, changes in timing, conditions for his visit, 1.0
3/6/2013	Melinda Bird	0.6	draft memo re talk with Hill, including analysis of changes and points to establsih with opposing counsel for his inspection, .6
3/7/2013	Melinda Bird	0.6	review responds re expert visit, .1; draft response to co-counsel re medical records, need for releases, previsou expert visits, .5
3/12/2013	Melinda Bird	1.1	arrangements for Hill's inspection, .4; circulate ADA coord info, .2; draft and circulate retention letter, .5
3/25/2013	Melinda Bird	1.9	conf call with co-counsel re arrangements for inspection, .6; draft memo to expert re same, .4; edit and revise retention letter, .7; conf with L Daitsman re same, .2
3/26/2013	Melinda Bird	0.4	respond to emails re scheduling visit, .4

JOHNSON, LASD
#4589
DRC Attorney Hours
2/1/2013 through 7/31/2014

4/10/2013	Melinda Bird	0.5	email plus follow-up with expert, .5
4/15/2013	Melinda Bird	0.1	new arrangements for expert visit, .1
4/22/2013	Melinda Bird	0.9	review case status, emails from last week, .3; conf call with co-counsel, .5; retrieve and review files to prepare for Hill inspection, .1
4/26/2013	Melinda Bird	1.3	review emails re plan for expert visit, .6; review chron and prepare for visit, .7
4/28/2013	Melinda Bird	4.7	review correspondence, charts of records, releases, clients, .7; draft memo to prepare for records review, .5; draft outline for Hill visit, .5; review file notes from Bayley, berk, Scherer, 1.3; re-organize files and sort client records , 1.0; draft memo to Winston re case status, additional costs, .7;
4/29/2013	Melinda Bird	4.3	review responses to my memos, note new releases, .3; index and summarize records for 3 class members, prepare notes for expert and note file categories, 3.2; work closely with assistant to assemble and categorize electronic files, .8
4/29/2013	Melinda Bird	3.3	review Armstrong briefs, remedy in prep for expert vist, .3; arrange visit to inspect records, prepare check for new records, .8; draft memo to co-counsel re case update, .5; draft task list for co-counsel, .4; check on status of contacts re ADA coordinator, .1; research re existing releases, decs, prepare new list of class member for expert to interview based on research, 1.2
4/30/2013	Melinda Bird	8.2	prepare for file review at counsel's office, review and index existing files, 1.2; file review for 9 class members, 4.0; review charts, categorize records by subject, where class member is housed, .9; draft memo to expert re inspection arrangements, records review, .7; circulate, review, edit and send, .5; instructiins to assistant and arrangements to pick up and pay for new records, .4; index releases and decs, .3; review and respond to answer from Winston re case status, approval of expenses, .2;

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#4570
DRC Attorney Hours
2/1/2013 through 7/31/2014

5/1/2013	Melinda Bird	1	exchange of emails with opposing counsel re picking up additional medical records, .4; arrange to send Ingram release, .3; draft memos re preparing records for expert review, arranging to bates stamp, .3;
5/2/2013	Melinda Bird	1.8	arrange for Ingram records, .2; review client medical records, update and preo for client summaries, update 1.2; email re power charts, .1; respond to JP re depositions, .3
5/3/2013	Melinda Bird	6.2	prepare records to send to Dr. Hill, .5; draft memo to Hill, .5; download and review declarations, 1.2; summarize facts, prepare new summary 4.0
5/4/2013	Melinda Bird	0.3	draft memo to co-counsel re status of expert report, .3
5/7/2013	Melinda Bird	0.5	arrangements to pick up copy of missing records, conf 2x with assistant re same, .3; draft email to expert to confirm call and update re inspection, .2
5/9/2013	Melinda Bird	1.1	conf call with expert to prepare for inspection, discuss record review, 1.1
5/13/2013	Melinda Bird	0.5	conf with LD re expert arrangements, new records w power charts, .5
5/14/2013	Melinda Bird	3.5	interview class members at jail, 2.0; write up notes from interviews, add to report for expert, 1.5
5/15/2013	Melinda Bird	5.3	review materials to prepare for meeting with expert, .8; drive to pick up expert, .5; meeting with expert, 3.5; draft memo to J Clark to confirm expert inspection, .5;
5/16/2013	Melinda Bird	8	meet with Hill and Clark at jail, 1.2; interview clients at jail, 2.5; wrap-up meeting with Hill, 2.0; draft letter to Clark re 4 class members, .8; revised edits and circulate draft to expert, .4; draft outline of expert's points from meeting, .5; draft memo to co-counsel re update, issues to address in next negotiations, .6
5/20/2013	Melinda Bird	0.8	conf call with M Uzeta re result of Hill inspection, .8
5/22/2013	Melinda Bird	1.2	Final edits to letter to Clark, correct typos to Hill report, finalize and send, 1.2,
5/31/2013	Melinda Bird	0.9	email to MAC re SJ, .1; review and organize files from Hill inspection. .8

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#4571
DRC Attorney Hours
2/1/2013 through 7/31/2014

6/6/2013	Melinda Bird	3	review hill notes, & previous report, .5; copy excerpts from hill's old report, .6; draft outline of expert report, 1.3; review emails re prisoner complaint, .1; research hill notes, respond to co-counsel, .5;
6/7/2013	Melinda Bird	0.8	memos to co-counsel re materials to send to clark, plan for meeting next week, .6; arrange to redact report from other case,. 2;
6/10/2013	Melinda Bird	2.5	review notes from Washington records, .5; summarize for expert, .5; collect and send washington records to expert, .5; tel conf with co-counsel re expert findings, legal strategy, setting next meeting, 1.0
6/11/2013	Melinda Bird	1.2	tel conf with P Pearlman and M Uzeta re legal strategy, expert report, settlement meeting, .8; follow-up email to expert report, notes re D Washington medical records, .4;
6/12/2013	Melinda Bird	0.1	forward draft report to PP, .1
6/13/2013	Melinda Bird	0.4	draft memo re use of fresno complaint, .2; circulate expert report draft, .2;
6/19/2013	Melinda Bird	0.4	memos re fresno ada report, .4
6/20/2013	Melinda Bird	3	prep for settlement meeting with opposing counsel, review mediation briefs, 1.0; meeting with Clark and Beach, 1.5; follow-up meeting with co-counsel, .5
6/21/2013	Melinda Bird	0.5	emails with expert re report, .5
6/22/2013	Melinda Bird	1.9	review draft from expert, .4; review records to add bates cites to records, 1.5
6/23/2013	Melinda Bird	2	review of medical records for inmates A-F, add cites and page refs to expert report, 2.0;
6/24/2013	Melinda Bird	0.5	emails to expert, .1/ tel conf with expert, .2; review expert edits and finalize,. 2
6/25/2013	Melinda Bird	0.4	draft email to expert re comments on monitoring, .3; review and respond to draft letter from MU, .1;

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DRC Attorney Hours
2/1/2013 through 7/31/2014

6/26/2013	Melinda Bird	0.2	estimate staff hours,. 2
6/27/2013	Melinda Bird	0.2	arrange to save, review Ivory letters, .2
6/28/2013	Melinda Bird	0.3	arrangements re meetings, inspection, .3
7/1/2013	Melinda Bird	0.3	arrangements re meetings, inspection, .3
7/2/2013	Melinda Bird	2.2	inspection of new construction at jail site, 1.1; conf with MU, JP, .1; locate and forward to Clark additional info re ADA compliance, 1.0
7/3/2013	Melinda Bird	2	meet with co-counsel, plan case strategy, framing, 2.0
7/8/2013	Melinda Bird	0.5	review draft email, .1; draft and circulate edits, .3; review comments and final email,.1
7/9/2013	Melinda Bird	0.3	review email from Clark, respond, .2; review other responses, .1
7/10/2013	Melinda Bird	0.3	review email from county, respond, approve answer and county's reply, .3
7/16/2013	Melinda Bird	0.9	draft structure of medication brief, .6; cover memo to team re agenda and new time for call, .3
7/29/2013	Melinda Bird	0.2	brief DRC team re case status, .2
8/5/2013	Melinda Bird	0.6	draft memo to expert re monitoring protocol, .6
8/6/2013	Melinda Bird	0.2	review memo from M Uzeta, respond with update, .2
8/7/2013	Melinda Bird	6	legal research re ADA defintions, .4; draft insert to mediation brief, 3.0; review and outline last mediation briefs, .8; review and outline Hopper expert report, .9 ; emails to Dr Hill re monitoring provisions, .5; email to Hill w new attachments, .4
8/8/2013	Melinda Bird	3.5	edits, final drafting re mediation brief sections, 3.2; draft and circulate cover memo, .3
8/10/2013	Melinda Bird	0.6	exchange memos with M Uzeta re mediation brief, .1; discuss legal strategy with YV, .5

JOHNSON, LASD
#4573
DRC Attorney Hours
2/1/2013 through 7/31/2014

8/12/2013	Melinda Bird	1.5	review draft mediation brief, .5; conf call with co-counsel re brief, legal strategy, meeting with defs on 8/15, 1.0
8/13/2013	Melinda Bird	3.5	review new draft of mediation brief, .6; draft new sections of brief, add cites, 2.5; additional edits to M Uzeta, .4
8/14/2013	Melinda Bird	0.9	review new letter from defs, .4; review final mediation brief with attachments, .4 arraneg to add to file, .1
8/15/2013	Melinda Bird	4.6	travel to and meet with defendants at TTCF, 2.5; meet with co-counsel re legal strategy, .6; update chart of time, atty fee rates, .9; finalzie chartm, circulate, .6;
8/16/2013	Melinda Bird	0.9	collect, review, finalize expenses, circulate, .9
8/19/2013	Melinda Bird	4.1	new edits to proposed settlement agreement, 2.5; revise and send to county and mediator, .2; review county's new draft agreement, .6; prepare compare docs version, .2; prepare timeline re fairness hearing to present to mediator, .6
8/20/2013	Melinda Bird	8.5	travel to and attend all day mediation with Tevrizian, 8.0; memo re outcome, .5;
9/3/2013	Melinda Bird	1	respond to JP re complaints, edits to agreement, 1.0;
9/6/2013	Melinda Bird	0.8	review, comments on edits to settlement agreement, .4; verify and update expenses, .3; circulate revised expenses, .1
9/9/2013	Melinda Bird	1.5	final edits, exercise billing judgment re time, 1.5;
9/10/2013	Melinda Bird	0.4	review revised time records, .2; arrange with paralegal to PDF and send, .2
9/16/2013	Melinda Bird	2	draft memo re issues with settlement and class notice, .7; call, .4; exchnage of memos 4x re settlement agreement, provisions for fairness hearing, .9
9/23/2013	Melinda Bird	1.2	conf call with co-counsel re class settlement procedures, response from county, 1.0; respond re schedule for future calls, .2

JOHNSON, LASD
#4574
DRC Attorney Hours
2/1/2013 through 7/31/2014

10/14/2013	Melinda Bird	0.8	review response from county, .3, conf call with co-counsel re same, .5
10/15/2013	Melinda Bird	0.3	respond to question from intake re complaints from LA county jail, .3
10/31/2013	Melinda Bird	0.2	RESPOND TO ARRANGEMENTS RE CALL WITH MEDIATOR, .2
11/1/2013	Melinda Bird	0.4	follow-up re call with mediator, .4
5/27/2014	Melinda Bird	1.7	review emails, returns calls to team, .4; conf with Candis re same, .5; emails with ACLU re report on diversion from jail, .3; review report, .5
5/30/2014	Melinda Bird	0.6	send email re closure of DD pod, .1; review new proposals re MH in jail, .5
6/2/2014	Melinda Bird	2	review ACLU report, send comments to DRC, 1.5; call l/m with Jessica, paula re status, .2; review memo from PP re status, .3
6/4/2014	Melinda Bird	0.5	review files, prepare for shredding, .5
6/9/2014	Melinda Bird	0.5	respond 2x to email re setting status conf., leave message, talk to PP, .5
6/11/2014	Melinda Bird	0.2	review and respond to email from Paula P re new status conf, .2
6/23/2014	Melinda Bird	1.4	print and review new ADA report from jail, .5; tel conf 2x with PP re delays in settlement, meeting with justice deputies, .6; prepare list of deputies to schedule calls, .3
7/12/2014	Melinda Bird	0.6	respond to inquiry from intake re need for videophone, .4; memo to DRLC re same, .2
7/26/2014	Melinda Bird	0.6	respond to Suzi B re intake from class member, .3; forward info to co-counsel and review response, .3
7/31/2014	Melinda Bird	0.5	review and approve draft ltr from Jessica P re ADA coordinator, email to team re same, .5
	Melinda Bird Total	146.2	
2/4/2013	Monisha Coelho	0.3	review and revise letter to appeals council
2/6/2013	Monisha Coelho	0.2	discussion re: Johnson case
	Monisha Coelho Total	0.5	
	Grand Total	152.5	

EXHIBIT C



California's protection and advocacy system

www.disabilityrightscalifornia.org

Toll Free: (800) 776-5746

TTY: (800) 719-5798

**Disability Rights California
Attorneys' Fee Rates – 2013-2014**

Year Graduated	Years of Experience	2013-2014
1977 and before	35+	\$850
1978	35	820
1979	34	810
1980	33	800
1981	32	790
1982	31	780
1983	30	770
1984	29	760
1985	28	750
1986	27	740
1987	26	730
1988	25	720
1989	24	710
1990	23	700
1991	22	690
1992	21	680
1993	20	670
1994	19	655
1995	18	640
1996	17	625
1997	16	605
1998	15	590

Year Graduated	Years of Experience	2013-2014
1999	14	575
2000	13	560
2001	12	545
2002	11	530
2003	10	515
2004	9	500
2005	8	485
2006	7	470
2007	6	455
2008	5	440
2009	4	425
2010	3	400
2011	2	375
2012	1	350
2013		325
Law Graduate		300
Law Clerk		230
Policy Analyst		250
Advocate		200
Paralegal		200

NOTES:

1. These base rates reflect research into current market rates in Los Angeles and the Bay area as of May, 2013. Adjustments should be considered for particular staff based on their experience and other market rate research.
2. Market rates for cases and staff in our Sacramento, Fresno and San Diego office will be lower than those listed. A fee request in these localities should note that these are our standard rates. The fee request could include a justification for these rates based on the need for statewide expertise or staffing, and/or may include an offer of a lower rate based on the circumstances of the case and after consultation with a Director of Litigation.
3. Market rates in special education cases may also be lower than those listed. Please proceed as in # 2 above.

EXHIBIT D

Disability Rights California

Johnson v. LA County Sheriffs

Expenses 2/8/2010 through 6/30/2013

ID	Document Date	Document Number	Transaction Description	Debit	Category
	1/31/2011	1-30	LA MCC0066 COPIER - COPIES 1/11	\$ 0.05	Copies
	1/31/2011	1-30	LA MCC0066 COPIER SUPPLIES 1/11	\$ 0.07	Copies
	2/28/2011	2-30	LA MCC0066 COPIER - COPIES 2/11	\$ 1.98	Copies
	2/28/2011	2-30	LA MCC0066 COPIER SUPPLIES 2/11	\$ 3.15	Copies
	2/28/2011	2-31	LA MCC0066 CM5520 COPIER - COPIES 2/11	\$ 3.18	Copies
	2/28/2011	2-31	LA MCC0066 CM5520 COPIER SUPPLIES 2/11	\$ 3.95	Copies
	3/31/2011	3-30	LA MCC0066 COPIER - COPIES 3/11	\$ 3.32	Copies
	3/31/2011	3-30	LA MCC0066 COPIER SUPPLIES 3/11	\$ 5.21	Copies
	3/31/2011	3-31	LA MCC0066 CM5520 COPIER - COPIES 3/11	\$ 0.07	Copies
	3/31/2011	3-31	LA MCC0066 CM5520 COPIER SUPPLIES 3/11	\$ 0.12	Copies
	4/30/2011	4-30	LA MCC0066 COPIER - COPIES 4/11	\$ 0.24	Copies
	4/30/2011	4-30	LA MCC0066 COPIER SUPPLIES 4/11	\$ 0.47	Copies
	4/30/2011	4-31	LA MCC0066 CM5520 COPIER - COPIES 4/11	\$ 7.71	Copies
	4/30/2011	4-31	LA MCC0066 CM5520 COPIER SUPPLIES 4/11	\$ 13.15	Copies
	5/31/2011	5-30	LA MCC0066 COPIER SUPPLIES 5/11	\$ 2.08	Copies
	5/31/2011	5-30	LA MCC0066 COPIER - COPIES 5/11	\$ 1.22	Copies
	5/31/2011	5-31	LA MCC0066 CM5520 COPIER SUPPLIES 5/11	\$ 12.45	Copies
	5/31/2011	5-31	LA MCC0066 CM5520 COPIER - COPIES 5/11	\$ 8.22	Copies
	6/30/2011	6-30	LA MCC0066 COPIER - COPIES 6/11	\$ 0.15	Copies

Disability Rights California

Johnson v. LA County Sheriffs

Expenses 2/8/2010 through 6/30/2013

	6/30/2011	6-30	LA MCC0066 COPIER SUPPLIES 6/11	\$ 0.23	Copies
	6/30/2011	6-31	LA MCC0066 CM5520 COPIER - COPIES 6/11	\$ 12.21	Copies
	6/30/2011	6-31	LA MCC0066 CM5520 COPIER SUPPLIES 6/11	\$ 27.33	Copies
	7/31/2011	7-30	LA MCC0066 COPIER SUPPLIES 7/11	\$ 17.95	Copies
	7/31/2011	7-30	LA MCC0066 COPIER - COPIES 7/11	\$ 10.90	Copies
	7/31/2011	7-31	LA MCC0066 CM5520 COPIER SUPPLIES 7/11	\$ 0.50	Copies
	7/31/2011	7-31	LA MCC0066 CM5520 COPIER - COPIES 7/11	\$ 0.24	Copies
	8/31/2011	8-30	LA MCC0066 COPIER SUPPLIES 8/11	\$ 0.55	Copies
	8/31/2011	8-30	LA MCC0066 COPIER - COPIES 8/11	\$ 0.33	Copies
	8/31/2011	8-31	LA MCC0066 CM5520 COPIER SUPPLIES 8/11	\$ 12.47	Copies
	8/31/2011	8-31	LA MCC0066 CM5520 COPIER - COPIES 8/11	\$ 6.60	Copies
	9/30/2011	9-30	LA MCC0066 COPIER SUPPLIES 9/11	\$ 6.94	Copies
	9/30/2011	9-30	LA MCC0066 COPIER SUPPLIES 9/11	\$ 0.77	Copies
	9/30/2011	9-30	LA MCC0066 COPIER - COPIES 9/11	\$ 3.94	Copies
	9/30/2011	9-30	LA MCC0066 COPIER - COPIES 9/11	\$ 0.44	Copies
	10/31/2011	10-31	LA MCC0066 COPIER SUPPLIES 10/11	\$ 0.03	Copies
	10/31/2011	10-31	LA MCC0066 COPIER - COPIES 10/11	\$ 0.02	Copies
	12/31/2011	12-32	LA CM5520 MCC0066 COPIER SUPPLIES 12/11	\$ 0.03	Copies
	12/31/2011	12-32	LA CM5520 MCC0066 COPIER - COPIES 12/11	\$ 0.03	Copies
	3/31/2012	3-30	LA MCC0066 COPIER SUPPLIES 3/12	\$ 6.89	Copies

Disability Rights California

#4581

Johnson v. LA County Sheriffs

Expenses 2/8/2010 through 6/30/2013

	3/31/2012	3-30	LA MCC0066 COPIER SUPPLIES 3/12	\$ 0.77	Copies
	3/31/2012	3-30	LA MCC0066 COPIER - COPIES 3/12	\$ 4.73	Copies
	3/31/2012	3-30	LA MCC0066 COPIER - COPIES 3/12	\$ 0.52	Copies
	3/31/2012	3-31	LA CM5520 MCC0066 COPIER SUPPLIES 3/12	\$ 0.19	Copies
	3/31/2012	3-31	LA CM5520 MCC0066 COPIER SUPPLIES 3/12	\$ 0.02	Copies
	3/31/2012	3-31	LA CM5520 MCC0066 COPIER - COPIES 3/12	\$ 0.14	Copies
	3/31/2012	3-31	LA CM5520 MCC0066 COPIER - COPIES 3/12	\$ 0.01	Copies
	4/30/2012	4-30	LA MCC0066 COPIER - COPIES 4/12	\$ 0.03	Copies
	4/30/2012	4-30	LA MCC0066 COPIER SUPPLIES 4/12	\$ 0.03	Copies
	4/30/2012	4-31	LA CM5520 MCC0066 COPIER SUPPLIES 4/12	\$ 0.23	Copies
	4/30/2012	4-31	LA CM5520 MCC0066 COPIER SUPPLIES 4/12	\$ 0.03	Copies
	4/30/2012	4-31	LA CM5520 MCC0066 COPIER - COPIES 4/12	\$ 0.31	Copies
	4/30/2012	4-31	LA CM5520 MCC0066 COPIER - COPIES 4/12	\$ 0.03	Copies
	6/30/2012	6-31	LA CM5520 MCC0066 COPIER SUPPLIES 6/12	\$ 1.40	Copies
	6/30/2012	6-31	LA CM5520 MCC0066 COPIER SUPPLIES 6/12	\$ 0.16	Copies
	6/30/2012	6-31	LA CM5520 MCC0066 COPIER - COPIES 6/12	\$ 1.31	Copies
	6/30/2012	6-31	LA CM5520 MCC0066 COPIER - COPIES 6/12	\$ 0.15	Copies
	7/31/2012	7-31	LA CM5520 MCC0066 COPIER - COPIES 7/12	\$ 3.78	copies
	7/31/2012	7-31	LA CM5520 MCC0066 COPIER SUPPLIES 7/12	\$ 5.72	copies
	9/30/2012	9-31	LA MCC0066 COPIER - COPIES 9/12	\$ 0.52	copies

Disability Rights California
#4582
Johnson v. LA County Sheriffs
Expenses 2/8/2010 through 6/30/2013

	9/30/2012	9-31	LA MCC0066 COPIER SUPPLIES 9/12	\$ 0.83	copies
	10/31/2012	10-31	LA MCC0066 COPIER - COPIES 10/12	\$ 0.39	copies
	10/31/2012	10-31	LA MCC0066 COPIER SUPPLIES 10/12	\$ 0.59	copies
	5/31/2013	5-31	LA MCC0066 COPIER - COPIES 5/13	\$ 5.83	copies
	5/31/2013	5-31	LA MCC0066 COPIER SUPPLIES 5/13	\$ 7.86	copies
				\$ 210.77	Copies Total
BAYLEY_KEVIN	4/14/2011	TR10416	BAYLEY MCC0066 DEPOSITION PREP LA 4/11/11	\$ 74.45	Deposition
				\$ 74.45	Deposition Total
HILL, T	12/6/2010	PO#-38460	38460 LA MCC0066 RECORD REVIEW 11/8-11/15/10	\$ 5,000.00	Expert
HILL, T	1/18/2011	38460 011811	38460 LA MCC0066 EXPERT TRAVEL CHRGS 11/15/10	\$ 327.88	Expert
HILL, T	5/24/2013	44399 052413	44399 LA MCC0066 JAIL VISIT- REPORT-RECORD REVIEW 5/4- 5/19/13	\$ 4,075.00	expert
HILL, T	5/24/2013	44399 052413-1	44399 LA MCC0066 TRAVEL 5/15- 5/16/13	\$ 724.18	expert
				\$ 10,127.06	Expert Total
PC LA ALAS	6/30/2010	PC LA 063010	TOFIGH MCC0066 COURT APPEARANCE LA 6/28/10	\$ 2.50	Hearing
BIRD	1/19/2011	TR9885	BIRD MCC0066 ARGUMENT PREP LA 1/6/11	\$ 6.00	Hearing
BAYLEY_KEVIN	4/14/2011	TR10416	BAYLEY MCC0066 ATTEND COURT LA 4/14/11	\$ 6.00	Hearing
				\$ 14.50	Hearing Total
SCHERER, R	3/23/2010	TR8372	SCHERER 918324 MTG W/CLIENT LA 3/23/10	\$ 3.18	Meeting
SCHERER, R	3/23/2010	TR8372	SCHERER 918324 MTG W/CLIENT LA 3/5/10	\$ 5.26	Meeting
	3/30/2010	3-41	14 18555 - LA 918324 MTG 3/23/10	\$ 34.86	Meeting

Disability Rights California
 # 4583
 Johnson v. LA County Sheriffs
 Expenses 2/8/2010 through 6/30/2013

SCHERER, R	4/8/2010	TR8435	SCHERER 918324 MTG W/CLIENT LA 4/3/10	\$ 13.24	Meeting
SCHERER, R	4/30/2010	TR8543	SCHERER 918324 MTG W/CLIENT LA 4/20/10	\$ 3.31	Meeting
SCHERER, R	4/30/2010	TR8543	SCHERER 918324 MTG W/CLIENT LA 4/10/10	\$ 13.24	Meeting
SCHERER, R	4/30/2010	TR8543	SCHERER 918324 MTG W/CLIENT LA 4/10/10	\$ 6.62	Meeting
ENTERPRISE ROSE	12/7/2010	112385973	38135 BAYLEY MCC0066 MTG W/ CLIENT WASCO 11/29/10	\$ 56.07	Meeting
ENTERPRISE ROSE	4/19/2011	115303317	39058 BAYLEY MCC0066 MTG W/ CLIENT LA 4/10/11	\$ 42.11	Meeting
SCHERER, R	4/28/2011	TR10300	SCHERER MCC0066 MTG W/ CLIENTS LA 4/18/11	\$ 13.23	Meeting
SCHERER, R	4/28/2011	TR10300	SCHERER MCC0066 MTG W/ CLIENTS LA 4/12/11	\$ 13.23	Meeting
SCHERER, R	5/26/2011	TR10454	SCHERER MCC0066 MTG W/ CLIENT LA 5/26/11	\$ 11.95	Meeting
SCHERER, R	5/26/2011	TR10454	SCHERER MCC0066 MTG W/ CLIENTS LA 5/25/11	\$ 13.23	Meeting
SCHERER, R	5/26/2011	TR10454	SCHERER MCC0066 MTG W/ CO COUNSEL LA 5/23/11	\$ 11.29	Meeting
SCHERER, R	5/26/2011	TR10454	SCHERER MCC0066 MTG W/ CLIENTS LA 5/19/11	\$ 13.23	Meeting
SCHERER, R	6/17/2011	TR10555	SCHERER MCC0066 MTG W/ CLIENTS LA 6/7/11	\$ 13.23	Meeting
SCHERER, R	6/17/2011	TR10555	SCHERER MCC0066 SETTLEMENT MTG LA 6/17/11	\$ 8.52	Meeting
SCHERER, R	7/22/2011	TR10770	SCHERER MCC0066 MTG W/ ATTYS SF 7/12/11	\$ 19.00	Meeting
	9/30/2011	9-38	27 20868 - LA MCC0066 MTG 9/30/11	\$ 12.32	Meeting
	9/30/2011	9-38	27 20868 - LA MCC0066 MTG 9/30/11	\$ 1.37	Meeting
UNITED_AIR	3/1/2012	0301129904 6	1 BIRD MCC0066 MTG W/ CO- COUNSEL OAK 3/6/12	\$ 108.72	Meeting
UNITED_AIR	3/1/2012	0301129904 6	1 BIRD MCC0066 MTG W/ CO- COUNSEL OAK 3/6/12	\$ 12.08	Meeting
				\$ 429.29	Meeting Total

Disability Rights California
 #4584
 Johnson v. LA County Sheriffs
 Expenses 2/8/2010 through 6/30/2013

FED_EXPRESS	5/21/2010	7-098-90706	6 ACCT 1021-2723-4 LA 918324 SHIPPING BILLED 5/21/10	\$ 9.26	Postage
FED_EXPRESS	11/19/2010	7-299-78400	5 ACCT 1021-2723-4 LA MCC0066 SHIPPING BILLED 11/19/10	\$ 29.87	Postage
FED_EXPRESS	12/17/2010	7-330-35226	5 ACCT 1021-2723-4 LA MCC0066 SHIPPING BILLED 12/17/10	\$ 15.96	Postage
	7/31/2011	7-22	LA MCC0066 POSTAGE EXP 7/11	\$ 3.16	Postage
	9/30/2011	9-22	LA MCC0066 POSTAGE EXP 9/11	\$ 0.40	Postage
	9/30/2011	9-22	LA MCC0066 POSTAGE EXP 9/11	\$ 0.04	Postage
FED_EXPRESS	5/17/2013	2-275-49364	5 ACCT 1021-2723-4 LA MCC0066 SHIPPING BILLED 5/17/13	\$ 29.25	postage
FED_EXPRESS	5/17/2013	2-275-49364	6 ACCT 1021-2723-4 LA MCC0066 SHIPPING BILLED 5/17/13	\$ 19.00	postage
FED_EXPRESS	5/17/2013	2-275-49364	7 ACCT 1021-2723-4 LA MCC0066 SHIPPING BILLED 5/17/13	\$ 36.06	postage
				\$ 143.00	Postage Total
SCHERER, R	4/14/2010	PO#-36359	36359 LA 918324 RECORD REQUEST 4/12/10	\$ 14.20	Records
BUSINESS CARD	9/4/2010	RA-090410	LA MCC0066 PUBLIC ACCESS COURT RECORDS 8/23/10	\$ 3.20	Records
BUSINESS CARD	11/4/2010	RA-110410	LA MCC0066 PUBLIC ACCESS TO ELECTRONIC COURT RECORDS 10/20	\$ 2.80	Records
VERDURA GROUP	12/1/2010	de00001504 81	38415 MCC0066 RECORD REQUEST	\$ 23.71	Records
VERDURA GROUP	12/1/2010	de00001504 82	38415 MCC0066 RECORD REQUEST	\$ 23.71	Records
IMAGE QUEST	6/23/2011	28537	39732 LA MCC0066 RECORD REQUEST	\$ 812.94	Records
CORRECTIONS	11/15/2011	PO#-40806	40806 LA MCC0066 RECORDS REQUEST	\$ 73.48	Records
CORRECTIONS	11/15/2011	PO#-40806	40806 LA MCC0066 RECORDS REQUEST	\$ 8.16	Records
	10/31/2012	10-78	LA MCC0066 RECORD COPIES	\$ 72.40	records

Disability Rights California

Johnson v. LA County Sheriffs

Expenses 2/8/2010 through 6/30/2013

LA SHERIFF	4/30/2013	44716 043013	44716 LA MCC0066 RECORD REQUEST	\$ 1,550.50	records
BIRD	4/30/2013	TR13678	M BIRD MCC0066 RECORD REVIEW GLENDALE 4/30/13	\$ 20.26	records
LA SHERIFF	5/2/2013	44716 050213	44716 LA MCC0066 RECORD REQUEST	\$ 85.25	records
PRIETTO, C	5/2/2013	TR13493	C PRIETTO MCC0066 P/U RECORDS LA 5/1/13	\$ 2.59	records
PRIETTO, C	5/2/2013	TR13493	C PRIETTO MCC0066 P/U RECORDS LA 5/2/13	\$ 2.59	records
				\$ 2,695.79	Records Total
PACER	1/5/2011	PA0639- Q42010	38763 LA MCC0066 LEGAL SEARCH	\$ 2.64	Research
PACER	4/6/2011	PA0639- Q12011	39060 LA MCC0066 LEGAL SEARCH 1/11-2/11	\$ 0.64	Research
IRONST CC FEDS	9/1/2011	RA-090111	LA MCC0066 ARCHIVED ARTICLES 8/10/11	\$ 3.95	Research
IRONST CC FEDS	9/1/2011	RA-090111	LA MCC0066 ARCHIVED ARTICLES 2ND CHRG 8/10/11	\$ 3.95	Research
FIRST CC FEDS	6/1/2012	RA-060112	LA MCC0066 ACCESS PUBLIC RECORDS	\$ 1.80	Research
FIRST CC FEDS	6/1/2012	RA-060112	LA MCC0066 ACCESS PUBLIC RECORDS	\$ 0.20	Research
WEST	10/1/2012	825749030	40812 ACCT 1000301141 LA MCC0066 DATABASE SRVC 9/12	\$ 60.00	research
				\$ 73.18	Research Total
BAYLEY_KEVIN	4/14/2011	TR10416	BAYLEY MCC0066 DEPOSITION LA 4/1/11	\$ 15.00	Transcript
LUDWIG KLEIN	7/15/2011	187125	40072 LA MCC0066 DEPOSITION COPY	\$ 1,302.43	Transcript
LUDWIG KLEIN	7/15/2011	187283	40072 LA MCC0066 DEPOSITION COPY	\$ 345.78	Transcript
LUDWIG KLEIN	7/29/2011	187320	40092 LA MCC0066 DEPOSITION COPY	\$ 678.65	Transcript
LUDWIG KLEIN	8/15/2011	187370	40135 LA MCC0066 DEPOSITION COPY	\$ 532.18	Transcript
LUDWIG KLEIN	8/15/2011	187371	40135 LA MCC0066 DEPOSITION COPY	\$ 460.10	Transcript

Disability Rights California

4586

Johnson v. LA County Sheriffs

Expenses 2/8/2010 through 6/30/2013

LUDWIG KLEIN	8/15/2011	187447	40135 LA MCC0066 DEPOSITION COPY	\$ 250.00	Transcript
LUDWIG KLEIN	8/15/2011	187476	40199 LA MCC0066 DEPOSITION COPY	\$ 720.60	Transcript
LUDWIG KLEIN	8/15/2011	187479	40199 LA MCC0066 DEPOSITION COPY	\$ 558.50	Transcript
LUDWIG KLEIN	8/31/2011	187588	40351 LA MCC0066 DEPOSITION COPY	\$ 674.42	Transcript
LUDWIG KLEIN	8/31/2011	187588	40351 LA MCC0066 DEPOSITION COPY	\$ 74.93	Transcript
LUDWIG KLEIN	8/31/2011	187694	40410 LA MCC0066 DEPOSITION COPY	\$ 977.67	Transcript
LUDWIG KLEIN	8/31/2011	187694	40410 LA MCC0066 DEPOSITION COPY	\$ 108.63	Transcript
LUDWIG KLEIN	8/31/2011	187695	40410 LA MCC0066 DEPOSITION COPY	\$ 723.56	Transcript
LUDWIG KLEIN	8/31/2011	187695	40410 LA MCC0066 DEPOSITION COPY	\$ 80.39	Transcript
LUDWIG KLEIN	8/31/2011	187724	40410 LA MCC0066 DEPOSITION COPY	\$ 718.43	Transcript
LUDWIG KLEIN	8/31/2011	187724	40410 LA MCC0066 DEPOSITION COPY	\$ 79.82	Transcript
				\$ 8,301.09	Transcript Total
				\$ 22,069.13	Grand Total

Copies	\$210.77
Depositions	\$74.45
Expert	\$10,127.06
Hearings	\$14.50
Meetings	\$429.29
Postage	\$143.00
Records	\$2,695.79
Research	\$73.18
Transcripts	\$8,301.09
TOTAL	\$22,069.13